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Treatment Program for Light Brown Apple Moth in Santa Cruz and Northern Monterey Counties, California

Environmental Assessment, September 2007

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I. Introduction

A. Biology of Light Brown Apple Moth

The light brown apple moth (LBAM) (*Epiphyas postvittana*) is native to Australia where it is an economically important pest on many fruit crops. The LBAM attacks a wide variety of plants. A recently compiled LBAM host list (USDA, 2007a; see appendix A) indicates there are at least 2,042 different plants that are reported to be hosts of LBAM. The list includes numerous native plants, forest species, and over 200 agronomically important crops (appendix A). In addition to Australia, LBAM has also been found in New Zealand, New Caledonia, Hawaii, and the British Isles.

The moth lays eggs in overlapping masses, preferably on leaves, but also on fruit and stems of the host plant. The larvae hatch and then pass through six stages of growth reaching approximately 18 millimeters (mm) in length before pupation. Young larvae are pale yellow while the mature larvae are pale green (Mo, 2006). Larvae will feed on leaves and fruit from susceptible host plants. In all stages, larvae will construct silken shelters at the feeding site which is where pupation occurs. Both female and male adults are light brown in color. The females are distinguished by a dark spot in the center of the front wings when folded. The number of LBAM generations produced in a growing season varies from one to over four, depending on environmental conditions (Danthanarayana, 1983; Mo et al., 2006), although the climate in California may allow four to five generations to occur in the infested counties. In cases where multiple generations occur in a season, the population can build to economically important thresholds quickly.

B. History of Infestation in California

The California Department of Food and Agriculture (CDFA) was notified on February 6, 2007, that LBAM had been found in 2006 and subsequently identified by an Australian expert from a site near Berkeley in Alameda County, California. This initiated CDFA trapping which resulted in the finding of additional moths beginning February 27. On March 16, 2007, the Agriculture Research Service Systematic Entomology Laboratory in Washington, DC confirmed that the original find was positive for LBAM. In response, pheromone-baited traps were placed in Alameda and Contra Costa Counties to determine where LBAM populations existed in the area. On April 20, 2007, CDFA issued a quarantine of at least 182-square miles in Alameda, Contra Costa, San Francisco, Marin, and Santa Clara Counties.

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) issued a Federal quarantine order on May 2, 2007, requiring trapping, inspection, and certification of all nursery stock and host commodities from quarantine areas. The original quarantine area consisted of only eight counties. Today the quarantine area includes the following counties: Alameda, Contra Costa, Los Angeles, Marin, Monterey, Napa, San Francisco, San Mateo, Santa Clara, Santa Cruz, and Solano. The quarantine area will continue to expand if LBAM is identified in new counties.

Since March 2007, more than 41,000 traps have been placed throughout California and approximately 8,000 moths have been confirmed as LBAM (CDFA, 2007a). Most of the captures (99 percent), however, are from traps located in two specific geographical areas. The first area, representing 87 percent of all LBAM captures, encompasses southern Santa Cruz and northern Monterey Counties. The second area, which represents approximately 12 percent of captures, includes contiguous portions of northwest Alameda, western Contra Costa, and northern San Francisco Counties. The remaining 1 percent came from mostly single trap captures in Los Angeles, Marin, Napa, San Mateo, Santa Clara, and Solano Counties.

In May, 2007, APHIS convened a group of international scientific experts (the Technical Working Group or TWG) to provide recommendations on short- and long-term plans to contain, control, and eradicate LBAM in California. The TWG toured the infested region on May 16 and concluded with a 2-day meeting in San Jose, California. They evaluated the distribution of LBAM and suggested treatment options for isolated areas and the main population areas. The recommendation of TWG was to prevent LBAM from spreading by first containing and eradicating LBAM from the outer edges of its range, and then eliminating the core population centers.

CDFA and APHIS started treatment of isolated populations in June 2007. To date, isolated populations in Napa, Oakley, Danville, Dublin, Sherman Oaks, San Jose, and Vallejo have been treated with pheromone twist ties, a mating disruption technique. The areas of Napa and Oakley also were treated with three ground applications of *Bacillus thuringiensis kurstaki* (Btk), a biologically based pesticide that is effective against early larval stages of most lepidopterans prior to the use of the pheromone twist ties.

Trapping results indicated that populations in the area from the Salinas River south to the Monterey Peninsula were growing and, if left

unchecked, could become an extension of the more heavily populated area around Soquel and southern Santa Cruz. In an effort to constrict this growth, the area from Marina and Seaside southward to and including most of the Monterey Peninsula was aerially treated on four consecutive nights beginning on the night of September 9 and ending in the early morning hours of September 13, 2007, with microencapsulated pheromone to disrupt LBAM mating. The total treatment area was approximately 36,500 acres. A second treatment of this area is anticipated after 30 days (the effective life of the microencapsulated pheromone once it has been applied). This treatment is currently scheduled to begin on or about October 9. Pheromone traps are in place and will remain throughout the treatment period and beyond to measure LBAM populations. This information will be used to evaluate the effectiveness of the treatments and for determining what additional treatments will be made to complete eradication efforts in this area.

C. Purpose and Need

APHIS is responsible for taking actions to exclude, eradicate, and/or control plant pests under the Plant Protection Act (7 United States Code (U.S.C.) 7701 et seq.). Therefore, it is important that APHIS take the steps necessary to eradicate LBAM from areas in California to prevent its spread to susceptible host plants throughout the United States.

Since LBAM is a new pest to the North American Continent, there is little information about how the moths will respond to treatment. The lack of experience with LBAM has made it difficult to determine the best eradication approach to take in California: therefore, the recommendations of TWG, several of whose members have direct experience with control of LBAM in Australia and New Zealand, has been especially welcomed. Based upon their recommendations, the current eradication efforts have mainly relied on mating disruption with different types of pheromone treatments.

The Santa Cruz-northern Monterey County population of LBAM is the largest in the State. Trapping results from here account for approximately 87 percent of all LBAM trapped to date (CDFA, 2007a). These moths are expected to remain active into November, and perhaps beyond, depending upon the weather conditions at local sites. A delay in treating this population is likely to result in an increased number of moths overwintering; therefore, it is desirable to begin treatments as early as possible since the pheromone is most efficacious when populations are low. The timing of applications to maximize efficacy based on the biology of LBAM is consistent with

integrated pest management strategies for controlling pests. It is expected that at the sometime around the end of October or beginning of November, the supplies of the pheromone will be sufficient to treat approximately 60,000 acres (see appendix B). Rather than waiting until next year, being able to provide a mating disruption treatment to the most populous LBAM center this year is expected to be more advantageous to the overall eradication efforts.

The remaining population center near San Francisco is less dense and, therefore, of less immediate concern. Treatment in this area will likely begin in spring 2008, after an assessment of this year's treatments has been completed.

Three environmental assessments (EAs) have been completed as areas have been designated for treatment. Those EAs include: Eradication of Isolated Populations of Light Brown Apple Moth in California, June 2007(USDA, 2007b); Eradication of Isolated Populations of Light Brown Apple Moth in California, Revised Environmental Assessment, July 2007 (USDA, 2007c); and, Treatment of Light Brown Apple Moth in the Seaside Area in California, Environmental Assessment, July 2007 (USDA, 2007d). These EAs are incorporated into this EA by reference.

This EA will analyze the environmental impacts anticipated from the proposed pheromone treatment of LBAM in Santa Cruz and northern Monterey Counties (see appendix B).

This EA has been prepared consistent with the National Environmental Policy Act of 1969 (NEPA)(42 U.S.C. 4321, et seq) and APHIS' NEPA implementing procedures (7 Code of Federal Regulations (CFR) part 372) for the purpose of evaluating how the proposed action, if implemented, may affect the quality of the human environment. We are providing a 30-day public comment period for response to this EA. (Please send any comments to Carole Johnson, Animal and Plant Health Inspection Service, Plant Protection and Quarantine, 4700 River Road, Unit 134, Riverdale, MD 20737.)

D. Affected Environment

The proposed treatment area consists of Santa Cruz County and northern Monterey County (see appendix B). LBAM has been found throughout much of this area. In fact, this area has approximately 87 percent of all LBAM captures in the State trapping program (CDFA, 2007a). As such, the entire area would be subject to the proposed pheromone treatments for mating disruption. This section

provides a general overview of the proposed treatment area, focusing on land use and host susceptibility.

Santa Cruz and northern Monterey Counties lie within three major land resource areas in California (USDA, 2006)—the Coastal Redwood Belt, the Central Coast Valley, and the Central Coast Range. The extreme northwest portion of Santa Cruz County lies within the Coastal Redwood Belt major land resource area. This area has a wide elevation range, extending from sea level along the Pacific coast to approximately 3,900 feet for some coastal range peaks. The average annual rainfall ranges from 23 to 98 inches, with an average annual temperature range of 49 to 59 °F.

Land use is dominated by forests followed by grassland and, to a lesser extent, farming and urban development. Vegetables and fruits are grown in areas that have favorable weather and soils. Several State parks exist within this major resource land area including Henry Cowell Redwoods, Fall Creek, Natural Bridges, Twin Lakes, New Brighton and Wilder Ranch. These parks contain a diverse population of plants, some of which are considered hosts for LBAM. For example, parks such as Henry Cowell Redwoods State Park contain Douglas fir, oak, and pine species, as well as the redwood and madrone, which are all occasional or common hosts for LBAM (appendix A). In another example, using the Wilder Ranch State Park plant inventory, the previously listed species as well as other plants such as California sagebrush, coyote brush, California bay and brome grasses are additional plants that have known susceptibility to LBAM (Wilder State Park 2002).

The above list of host species is not inclusive and does not include all known host plants for LBAM that may occur in the park, nor does it account for those plant species that have an unknown host susceptibility to LBAM. Several LBAM-susceptible native coastal plants and other susceptible host plants also exist in State parks that occupy the coastal areas. Urban development is minor as compared to the rest of the county with towns such as Boulder Creek, Felton, and Ben Loman being the major towns within the eastern edge of the Coastal Redwood area. Based on the presence of LBAM in other residential areas and the availability of hosts in the surrounding area, it is anticipated that susceptible host plants could be present in these towns.

The Central Coastal Valley region comprises the second area of the affected environment in Santa Cruz and northern Monterey Counties. Within the coastal valley area, the average precipitation ranges from

11 to 66 inches with most of the precipitation occurring as low or moderate frontal storms during winter.

Land use is divided primarily between cropland, grassland, and urban development, and, to a lesser extent, forests. Agriculture within the valley is principally truck crops, wine grapes, strawberries, and other fruits, cut flowers, small grains, hay, and pasture grown under irrigation. Several crops grown in this area, for example, strawberries and grapes, are common hosts for LBAM. Small grains are also grown under non-irrigated conditions (USDA, 2006). Urban development within the area includes Santa Cruz, Soquel, Rio Del Mar, and Watsonville, as well as other smaller towns. The coastal valley area extends as a small strip down to and including the town of Salinas, which is part of the agriculturally important Salinas Valley.

Santa Cruz, as well as the surrounding towns, currently have LBAM infestations that are expected to expand if left untreated, based on the number of susceptible hosts in urban and open areas. This area also has several State parks and beaches, such as Sunset State Beach, Manresa State Beach, and New Brighton State Beach, that occur along the coast. Several of the State beach parks have diverse plant life that includes multiple host plants for LBAM; for example, the coastal scrub and woodland habitats contain species such as coyote brush and Monterey pine, as well as other plants that are common host plants for LBAM.

The Central California Coast Range occupies the remainder of the potential area of pheromone treatment within southwestern Santa Cruz and northern Monterey County. This area has an average annual precipitation of 6 to 20 inches with most of the precipitation evenly distributed between the fall, winter, and spring, with low amounts in the summer (USDA, 2006).

Greater than half of the land use is in grassland followed by forest, cropland, and urban development. Agriculture in the area is limited to grains, with some fruit and vegetable production. Urban development consists of towns such as Prunedale and Castroville, as well as several other smaller towns in the area. Similar to areas identified in Santa Cruz and Monterey Counties, multiple native and agricultural species are present that are considered to be common hosts for LBAM. Natural areas, such as Royal Oaks State Park and the Salinas River National Refuge, include plants that are known hosts for LBAM.

Monterey Bay National Marine Sanctuary (MBNMS) extends along both Santa Cruz and Monterey Counties. The sanctuary is a federally protected marine area offshore of California's central coast. It stretches from Marin to Cambria, and encompasses a shoreline length of 276 miles and 5,322 square miles of ocean. It supports a diverse marine ecosystem and is home to numerous mammals, seabirds, fishes, invertebrates, and plants.

II. Alternatives

This EA analyzes the potential environmental consequences of the proposed action to eradicate populations of LBAM from Santa Cruz and northern Monterey Counties, California, where LBAM have been detected. Two alternatives are being considered: (1) no action by APHIS to eliminate LBAM, and (2) treatment of LBAM using applications of a pheromone for mating disruption.

A. No Action

The no action alternative consists of maintaining the current Federal order without further action by APHIS. Private landowners would manage LBAM infestations, as appropriate.

Pursuant to the Federal order, the following regulated articles would not be moved interstate from a quarantine area except in accordance with this order:

- Nursery stock;
- Cut flowers, garlands, wreaths, or greenery of any plants;
- Trees and bushes, including cut Christmas trees;
- Greenwaste:
- Fruits and vegetables;
- Hay, straw, fodder, and plant litter;
- Bulk herbs and spices;
- Any other products, articles, or means of conveyance of any character whatsoever, when it is determined by an inspector that they present a hazard of spread of LBAM.

B. Treatment Alternative

The treatment alternative consists of maintaining the Federal quarantine order to prevent the artificial spread of LBAM, as well as using an insect pheromone to treat areas within Santa Cruz and northern Monterey Counties where LBAM has been detected.

Insect sex pheromones are compounds that are naturally produced by members of one sex for the purpose of attracting the opposite sex of the same species. Distribution of pheromone throughout an area makes it difficult for the male to locate the female, thus disrupting mating for the species. For several lepidopteran pest species, including LBAM, the pheromone has been isolated and synthetically reproduced in order to be used to attract moths and, therefore, disrupt reproduction. There are two formulations of pheromone available to treat LBAM—a general tortricid pheromone that is attractive to species of the family Tortricidae (leafrollers), of which LBAM is a member, and an LBAM-specific pheromone. The LBAM-specific pheromone will be used when available.

Pheromone can be applied via a dispenser suspended from the ground, or applied by ground or aerial application equipment in microencapsulated capsules or flakes. When used at efficacious levels, the pheromone reduces the ability of male LBAM to locate and mate with females.

1. Dispensers

The dispensers are used at a rate of 250 dispensers per acre and are effective for 90 days before they need to be replaced.

2. Microencapsulated

The microencapsulated pheromone is effective for 30 days. Therefore, several applications may be needed per year. Applications of the LBAM-specific pheromone would be at the rate of 15 grams of active ingredient per acre (gai/A) and 20 gai/A for the general tortricid pheromone.

Due to the size of the proposed treatment area, aerial application of the microencapsulated pheromone will be the predominant treatment method. Aerial pheromone applications are planned to be conducted overnight, thus minimizing exposure of people. As infested areas are reduced in size over time, the use of dispensers may become more practical and, therefore, may increase in use. The initial treatment area is anticipated to consist of three blocks totalling approximately 60,000 acres located in the Soquel, Prunedale and north Salinas areas (see appendix B). Over time, however, the entire infested area within the Santa Cruz—northern Monterey population center will receive treatment. Any one area within this population center is likely to receive at least two and probably several treatments until it is determined that LBAM has been eradicated from the site. Complete eradication within the Santa Cruz and northern Monterey area is expected to take several years.

III. Environmental Impacts

A. No Action

Under the no action alternative, the current Federal order would remain in place without the application of pheromone. The host list for LBAM contains numerous species (trees, shrubs, and crops) that are common throughout the treatment area (see appendix A). Without treatment, LBAM would be allowed to flourish in the existing area and, consequently, continue to spread into surrounding areas. LBAM has the potential to severely damage residential landscapes, orchards, and agricultural crops.

Private individuals may utilize insecticides to control LBAM. However, without a coordinated treatment plan, reinfestation from adjacent untreated, infested sites will occur and would require additional applications, thus increasing pesticide loading to the environment. Alternative pesticides may have higher use rates and increased risks to human health and the environment. While several pesticides can be used against LBAM larvae, the only pesticide currently known to be efficacious against both eggs and larvae of LBAM is chlorpyrifos.

In addition to environmental impacts, LBAM could cause an estimated \$160 to \$640 million annually in crop damage and control costs if it spreads to agricultural production areas in the 11 affected counties (CDFA, 2007a). These estimated values were derived from the agricultural impacts in Australia and New Zealand from LBAM. If LBAM were to spread throughout the entire State of California damage and costs could reach up to \$2.4 billion annually. The presence of LBAM in the quarantine counties has caused restrictions on domestic and foreign trade. In 2003, California shipped over \$7.2 billion in food and agricultural commodities around the world (CASS, 2004). The loss of revenue from these restrictions is currently unknown; however this loss could be significant if LBAM becomes established throughout the State of California.

B. Treatment Alternative

As mentioned previously, there are two types of synthetic pheromones available to treat LBAM. The leafroller pheromone contains a compound that female leafrollers emit naturally to attract male moths. The LBAM-specific compound contains both the general female leafroller chemical as well as a chemical produced solely by the LBAM female. The LBAM-specific pheromone consists of, (E)-11-tetradecen-1-yl acetate and (E,E)-9,11-tetradecadien-1-yl acetate.

Both compounds have been identified in extracts of female LBAM and are active as a coalitive pair when combined (Bellas et al., 1983). The pheromone can be applied in individual dispensers, or, for larger areas, ground or aerial equipment can be used to broadcast spray the material.

The dispensers utilize the LBAM-specific pheromone that is contained within a sealed polyethylene tube containing 163.25 milligrams (mg) of (E)-11-tetradecen-1-yl acetate and 6.74 mg of (E,E)-9,11-tetradecadien-1-yl acetate. A wire is fused inside the plastic so that the dispenser can be twisted around a branch. The pheromone is released into the surrounding area and disrupts the ability of male LBAM to locate females. This treatment method has been shown to be an effective means of LBAM control in citrus, grapes, apple, and apricot orchards when adequate numbers of dispensers are used (Mo et al., 2006).

Over larger areas, pheromone can be applied in a biodegradable 80 to 150 micrometers (µm) microencapsulated polymer which has been shown to be an effective method of application when applied appropriately (Wilkins, 1990; Knight and Larsen, 2004; Mihou et al., 2007). The microencapsulated pheromone can be applied either by ground or aerial equipment and can consist of either the leafroller pheromone (at a rate of 20 gai/A) or the LBAM-specific pheromone (at a rate of 15 gai/A).

1. Toxicity

Based on available toxicity data, both pheromones have low acute oral and dermal toxicity in rats with median lethal dose (LD₅₀; i.e. the dose required to kill 50 percent of a test population) values of greater than 5,000 milligram per kilogram (mg/kg) and 2,000 mg/kg, respectively. Acute inhalation toxicity is also low based on the acute inhalation median lethal concentration (LC₅₀; i.e. the concentration required to kill 50 percent of a population) value of greater than 5.25 (grams per liter) g/L. These values are consistent with the toxicity profile for other lepidopteran pheromones that have been tested (OECD, 2002; Weatherston and Stewart, 2002). Available data suggests that lepidopteran pheromones have very low chronic toxicity to mammals (OECD, 2002; EPA, 1996). The pheromone is considered a slight to moderate dermal irritant and is not considered to be carcinogenic or mutagenic (Pacific Biocontrol Corporation, 2007).

Data for structurally similar pheromones indicate there is very low acute toxicity to birds with LD_{50} values greater than 2,000 mg/kg (Weatherston and Stewart, 2002). Toxicity to aquatic organisms is unknown for these two pheromones specifically; however, data for other pheromones suggest that fish LC_{50} values greater than 100 parts

per million (ppm), and aquatic invertebrate toxicity values range in the upper parts per billion (ppb) to low ppm range (Weatherston and Stewart, 2002; PMRA, 1994; Inscoe and Ridgway, 1992). Toxicity values for aquatic invertebrates may be misleading. Since the pheromone is hydrophobic, large amounts of pheromone must be added to the test chamber in order to obtain detectable amounts of pheromone in the water or else a solvent must be used. In the proposed application no solvent will be used and application rates are low at 15 to 20 grams a.i./acre. In addition, the pheromone is considered insoluble and it would not be possible for a body of water to achieve levels of dissolved pheromone that could approach toxic levels for aquatic invertebrates.

In summary, there are no reported adverse effects to humans, domestic or other nontarget animals, or the environment from the use of these pheromones.

2. Exposure and Risk

Lepidopteran pheromones are sensitive to ultraviolet radiation and oxidation where they breakdown rapidly in terrestrial and aquatic environments. The rapid breakdown and volatilization of lepidopteran pheromones and their mammalian toxicological profile have resulted in the Environmental Protection Agency (EPA) waiving the requirement of a food tolerance when applications do not exceed 150 grams of active ingredient per acre per year (g active ingredient/ac/year) (EPA, 2007). In addition to rapid degradation, lepidopteran pheromones have very low solubility or are insoluble in water suggesting low aquatic residues (OECD, 2002). This specific pheromone is reported to be insoluble in water (Pacific Biocontrol Corporation, 2007).

Exposure to humans, domestic and other nontarget animals, and the environment is expected to be minimal. In the case of the dispenser application, the pheromone is inside a plastic tube that is suspended in a tree; therefore, no human-related exposure from residues or drinking water is expected. The same would also be true for terrestrial nontarget organisms where exposure would be expected to be minimal. Exposure to aquatic organisms would not be expected when dispensers are used because label language prohibits discarding dispensers in surface water.

Pheromone that would be applied as a microencapsulated material in open and residential areas would not pose a risk to human health due to the known mammalian toxicity profile for lepidopteran pheromones and their environmental fate. Based on the known toxicology data for the pheromone, as well as similar types of compounds, acute and chronic effects do not occur at the highest concentrations tested; none

of the pheromones, to date, have shown any potential mutagenic or carcinogenic activity (Touhey, 1990; EPA, 1996; OECD, 2002). In addition to the lack of known toxicological effects, the exposure potential for humans is very low. No dietary exposure from food is expected due to the volatility of the pheromone. Incidental exposure through drinking water sources or swimming pools is expected to be minimal since the pheromone is insoluble in water and would remain at the surface volatilizing into the atmosphere. Both the low toxicity and lack of significant exposure result in minimal risk to human health from pheromone applications.

The only nontarget species that may be impacted by the use of pheromones could be native (or exotic) leafrollers that may be present and that could have their mating disrupted by the use of leafroller pheromone. Any impact to leafrollers would be minimal and temporary as populations would quickly recover due to immigration of leafrollers from adjacent, untreated areas. The use of LBAM-specific pheromone would only affect LBAM and perhaps a few other leafrollers. No other nontarget species are expected to be impacted. LBAM-specific pheromone is planned to be used in the initial application at Santa Cruz, and will be the preferred pheromone for all treatments based on available supplies.

The microencapsulated pheromone will also pose minimal risk to terrestrial wildlife and aquatic organisms. This is based on the known toxicity data for these types of pheromones, as well as the low exposure that would occur from ground or aerial pheromone applications. In addition, the pheromone will not be applied directly to open water per label instructions. As a means to quantify these conclusions, a screening level ecological risk assessment was prepared to address potential risk to nontarget fish and wildlife (see appendix C).

C. Cumulative Effects

Cumulative effects from potential pheromone use over several years is not expected to occur based on the known toxicity data, specificity of the pheromones to LBAM and leafrollers, and minimal risk to human health and the environment. Cumulative impacts to nontarget butterflies and moths, except for tortricids, from the use of pheromones are not anticipated because the pheromones are selective for LBAM and leafrollers. The cumulative impacts to leafrollers will be minimized because LBAM-specific pheromone will be used when available.

Treatments of isolated populations of LBAM have begun in a number of sites including Napa, Oakley, Danville, Dublin, Sherman Oaks, San Jose and Vallejo. Approximately 35 to 40 isolated populations have been identified; there is potential for additional sites to be identified in the future. Treatments in the isolated areas have primarily consisted of application of pheromone dispensers that are removed after 90 days. These areas are small in nature and occur outside of any aerially treated areas.

Recently, the Marina–Seaside–Monterey Peninsula area was treated with aerial application of microencapsulated pheromone. A second aerial application is anticipated in the near future. This area is adjacent to but not overlapping the proposed treatment area. Due to the nature of the pheromone, the minimal environmental effects, and the fact that the treatment areas do not overlap, it is unlikely that there will be any cumulative impacts with the use of this pheromone in isolated treatment areas of the Marina–Seaside–Monterey Peninsula and the Santa Cruz and Monterey County areas.

Future treatments for LBAM will be evaluated under subsequent EAs. The environmental impacts from these treatments will be evaluated in combination with treatments already underway.

D. Threatened and Endangered Species

Section 7(a)(2) of the Endangered Species Act (ESA) and its implementing regulations require all Federal agencies to ensure their actions are not likely to jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of critical habitat. CDFA and APHIS are working with the U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS) to insure that treatment activities considered in this EA do not affect listed species or their designated or proposed critical habitats. No treatments will occur in the treatment area until CDFA and APHIS have completed a determination of effects on listed species and their habitats and, if necessary, Section 7 consultation with FWS and/or NMFS has been concluded.

APHIS has designated CDFA as its non-Federal representative for the purpose of conducting informal consultation with FWS and NMFS on APHIS activities associated with the LBAM eradication program in California and will work with CDFA to develop all necessary consultation documents. Legally, APHIS retains ultimate responsibility for compliance with Section 7 of the ESA.

CDFA and APHIS will continue to work in close cooperation with NMFS and FWS during implementation any LBAM eradication efforts to insure that potential impacts to listed species and their designated critical habitats are avoided or minimized to the extent possible, and are consistent with the statutory and regulatory requirements of Section 7 of ESA.

E. Other Considerations

Executive Order (EO) 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations," focuses Federal attention on the environmental and human health conditions of minority and low-income communities and promotes community access to public information and public participation in matters relating to human health or the environment. This EO requires Federal agencies to conduct their programs, policies, and activities that substantially affect human health or the environment in a manner so as not to exclude persons and populations from participation in or benefiting from such programs. It also enforces existing statutes to prevent minority and low-income communities from being subjected to disproportionately high or adverse human health or environmental effects. APHIS has determined that the environmental and human health effects from the proposed applications for treatment of LBAM in California are minimal and are not expected to have disproportionate adverse effects to any minority or low-income populations.

EO 13045, "Protection of Children from Environmental Health Risks and Safety Risks," acknowledges that children, as compared to adults, may suffer disproportionately from environmental health and safety risks because of developmental stage, greater metabolic activity levels, and behavior patterns. This EO (to the extent permitted by law and consistent with the agency's mission) requires each Federal agency to identify, assess, and address environmental health risks and safety risks that may disproportionately affect children. Aerial pheromone applications are planned to be conducted overnight, thus minimizing exposure of people, and especially children; however the low toxicity of the pheromone minimizes any potential risk to children.

The Monterey Bay National Marine Sanctuary (sanctuary) is adjacent to the proposed treatment area. This is a federally protected marine area offshore of California's central coast. It stretches from Marin County to Cambria; it encompasses a shoreline length of 276 miles and 5,322 square miles of ocean. This area supports a diverse marine ecosystem and is home to numerous mammals, seabirds, fish, invertebrates, and plants in a remarkably productive coastal

environment. The sanctuary was established for the purposes of resource protection, research, education, and public use. Any discharge or deposit of foreign materials in the sanctuary that would be injurious requires a permit from the sanctuary.

Consultations with the marine sanctuary staff, prior to the recent treatment in the Marina-Seaside-Monterey Peninsula, identified areas of concern to the sanctuary. These concerns centered around the potential for aerially applied material to drift from the intended target and the risk that would be posed to marine resources, should that occur. APHIS and CDFA provided the sanctuary with additional information regarding the procedures and protocols of the aerial application of pheromone in the area, including transect maps. APHIS also provided additional risk assessment documentation (appendix C) that demonstrated that, even if some pheromone material were to enter water, there is little likelihood that it could result in any negative impacts on marine life. Testing indicates that toxicity thresholds are many times higher than the environmental concentrations that would be expected even if the pheromone were directly applied to the water. In addition, the pheromone is not soluble in water and quickly volatilizes or breaks down due to ultraviolet light and, therefore, would not affect aquatic organisms.

APHIS continues to consult with the sanctuary staff to ensure that their concerns are addressed with regard to the proposed treatment in Santa Cruz and northern Monterey Counties.

CDFA has consulted with the Central Coast Regional Water Quality Control Board to ensure that water quality standards are not jeopardized by the proposed program. The Water Quality Control Board indicated that as long as the applications are done as they were in the recent Marina–Seaside–Monterey Peninsula application (that is, material is applied in accordance with the restrictions of the Section 18 pesticide label and direct applications to open water are avoided), they have no objections to the proposal and will not require a permit.

IV. Listing of Agencies and Persons Consulted

U.S. Fish and Wildlife Service Ventura Fish & Wildlife Office 2493 Portola Road, Suite B Ventura, CA 93003

National Marine Fisheries Service Southwest Regional Office 501 West Ocean Blvd, Suite 4200 Long Beach, CA 90802–4213

U.S. Department of Agriculture Animal Plant Health Inspection Service Plant Protection and Quarantine Emergency and Domestic Programs 4700 River Rd. Unit 134 Riverdale, MD 20737

U.S. Department of Agriculture Animal and Plant Health Inspection Service Policy and Program Development Environmental Services 4700 River Road, Unit 149 Riverdale, MD 20737

California Department of Food and Agriculture Plant Health and Pest Prevention Services 1220 N Street Sacramento, CA 95814–5607

California Environmental Protection Agency Central Coast Regional Water Quality Control Board 895 Aerovista Place, Suite 101 San Luis Obispo, CA 93401

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Appendix A. Light Brown Apple Moth Host List

Genus Species	Common Name	Genus Match Host Prevalence
Abelia spp.	(abelia)	Occasional
Abies	fir	Common
Abies ×shastensis	Shasta red fir	Common
Abies amabilis	Pacific silver fir	Common
Abies bracteata	bristlecone fir	Common
Abies concolor	white fir	Common
Abies concolor	white fir	Common
Abies grandis	grand fir	Common
Abies lasiocarpa	subalpine fir	Common
Abies Iowiana		Common
Abies magnifica	California red fir	Common
Abies procera	noble fir	Common
Abies spp.	(fir)	Common
Acacia	acacia	Common
Acacia baileyana	cootamundra wattle	Common
Acacia cyclops	cyclops acacia	Common
Acacia dealbata	silver wattle	Common
Acacia decurrens	green wattle	Common
Acacia elata	cedar wattle	Common
Acacia farnesiana	sweet acacia	Common
Acacia greggii	catclaw acacia	Common
Acacia longifolia		Common
Acacia mearnsii	black wattle	Common
Acacia melanoxylon	blackwood	Common
Acacia paradoxa	paradox acacia	Common
Acacia podalyriifolia	pearl wattle	Common
Acacia pycnantha	golden wattle	Common
Acacia redolens	bank catclaw	Common
Acacia retinodes	water wattle	Common
Acacia saligna	orange wattle	Common
Acacia spp.	(acacias)	Common
Acacia verticillata	prickly Moses	Common
Acer	maple	
Acer campestre	hedge maple	
Acer circinatum	vine maple	
Acer glabrum	Douglas maple	
Acer glabrum	Greene's maple	
Acer glabrum	Rocky Mountain maple	
Acer glabrum	Torrey maple	
Acer macrophyllum	bigleaf maple	
Acer negundo	boxelder	
Acer negundo	California boxelder	
Acer saccharinum	silver maple	
Acer spp.	(maple)	
Achillea	yarrow	Common

Achillea filipendulina fernleaf yarrow Common Achillea millefolium California yarrow Common Achillea millefolium common yarrow Common Achillea millefolium Common giant yarrow Achillea millefolium Pacific yarrow Common Achillea millefolium western yarrow Common Achillea spp. Common (yarrow) Acmena spp. Occasional (lilly-pily tree) (Chinese gooseberry, kiwi, kiwifruit) Actinidia spp. Primary maidenhair fern Adiantum Occasional Adiantum xtracvi Occasional Adiantum aleuticum Aleutian maidenhair Occasional Adiantum capillus-veneris common maidenhair Occasional California maidenhair Occasional Adiantum jordanii Adiantum spp. (maidenhair ferns) Occasional Aesculus buckeye Occasional Aesculus californica California buckeye Occasional Aesculus spp. (horse chestnut, buckeye) Occasional Alnus alder Alnus cordata Italian alder Alnus incana gray alder thinleaf alder Alnus incana Alnus rhombifolia White Alder Alnus rhombifolia White Alder Alnus rubra red alder Alnus spp. (alder) Alnus viridis green alder Alnus viridis Siberian alder Alnus viridis Sitka alder Amaranthus pigweed Occasional Amaranthus albus Occasional prostrate pigweed Amaranthus arenicola sandhill amaranth Occasional Amaranthus blitoides mat amaranth Occasional Amaranthus blitum Occasional Amaranthus blitum purple amaranth Occasional Amaranthus californicus California amaranth Occasional Amaranthus caudatus love-lies-bleeding Occasional Amaranthus cruentus red amaranth Occasional Amaranthus deflexus largefruit amaranth Occasional Amaranthus fimbriatus fringed amaranth Occasional Amaranthus hybridus slim amaranth Occasional Amaranthus hypochondriacus Prince-of-Wales feather Occasional Amaranthus palmeri carelessweed Occasional Amaranthus powellii Occasional Powell's amaranth Amaranthus powellii Occasional Amaranthus retroflexus redroot amaranth Occasional Amaranthus spinosus spiny amaranth Occasional Amaranthus spp. Occasional Occasional Amaranthus torreyi Torrey's amaranthus Amaranthus tuberculatus roughfruit amaranth Occasional Amaranthus watsonii Occasional Watson's amaranth

Antirrhinum snapdragon Occasional Antirrhinum majus garden snapdragon Occasional Antirrhinum spp. (snapdragons) Occasional Apium celery Occasional Apium graveolens wild celery Occasional Apium nodiflorum European marshwort Occasional Occasional Apium spp. (celery) Aquilegia columbine Common Aquilegia eximia Van Houtte's columbine Common Aquilegia formosa western columbine Common Aquilegia pubescens Sierra columbine Common Aquilegia shockleyi Common

Aquilegia spp.(columbines)CommonArbutusmadroneCommonArbutus menziesiiPacific madroneCommonArbutus spp.Strawberry TreeCommon

Arctostaphylos manzanita

Arctostaphylos xbenitoensis Arctostaphylos xcampbelliae

Arctostaphylos xcinerea Waldo manzanita

Arctostaphylos ×helleri Arctostaphylos ×jepsonii Arctostaphylos ×laxiflora Arctostaphylos ×media Arctostaphylos ×parvifolia

PMC manzanita Arctostaphylos xrepens Arctostaphylos andersonii Santa Cruz manzanita Arctostaphylos auriculata Mount Diablo manzanita Arctostaphylos bakeri Baker's manzanita Arctostaphylos bakeri Baker's manzanita Arctostaphylos bakeri The Cedars manzanita Arctostaphylos canescens hoary manzanita Arctostaphylos canescens Sonoma manzanita

Arctostaphylos catalinae Santa Catalina Island Manzanita

Arctostaphylos columbiana hairy manzanita

Arctostaphylos confertiflora Santa Rosa Island Manzanita

La Cruz manzanita Arctostaphylos cruzensis Arctostaphylos densiflora Vine Hill manzanita Arctostaphylos edmundsii Little Sur manzanita Arctostaphylos gabrielensis San Gabriel manzanita Arctostaphylos glandulosa Adams' manzanita Arctostaphylos glandulosa Del Mar manzanita Arctostaphylos glandulosa Eastwood's manzanita Arctostaphylos glandulosa Zaca's manzanita Arctostaphylos glauca bigberry manzanita Arctostaphylos glutinosa Schreiber's manzanita Arctostaphylos hispidula Gasquet manzanita Arctostaphylos hookeri Franciscan manzanita Hearst's manzanita Arctostaphylos hookeri Arctostaphylos hookeri Hooker's manzanita Arctostaphylos hookeri Mt. Tamalpais manzanita Arctostaphylos hookeri Presidio manzanita Arctostaphylos hooveri Hoover's manzanita

Arctostaphylos imbricata San Bruno Mountain Manzanita

Arctostaphylos insularis island manzanita Arctostaphylos klamathensis Klamath manzanita Arctostaphylos luciana Santa Lucia manzanita Arctostaphylos malloryi Mallory's manzanita Arctostaphylos manzanita Contra Costa manzanita Arctostaphylos manzanita Konocti manzanita Arctostaphylos manzanita Roof's manzanita Arctostaphylos manzanita whiteleaf manzanita

Arctostaphylos manzanita Wieslander's manzanita Arctostaphylos mendocinoensis pygmy manzanita Arctostaphylos mewukka Indian manzanita Arctostaphylos mewukka True's manzanita Arctostaphylos montaraensis Montara manzanita Arctostaphylos monterevensis Monterev manzanita Arctostaphylos morroensis Morro manzanita Arctostaphylos myrtifolia Ione manzanita Arctostaphylos nevadensis pinemat manzanita Arctostaphylos nissenana Nissenan manzanita Arctostaphylos nortensis Del Norte manzanita

glossyleaf manzanita

sandmat manzanita

pointleaf manzanita

Rainbow manzanita

La Purissima manzanita

Arctostaphylos obispoensis serpentine manzanita Arctostaphylos osoensis Oso manzanita Arctostaphylos otayensis Otay manzanita Arctostaphylos pacifica Pacific manzanita Arctostaphylos pajaroensis Paiaro manzanita Arctostaphylos pallida Alameda manzanita Arctostaphylos parryana Parry manzanita Arctostaphylos patula greenleaf manzanita Pecho manzanita Arctostaphylos pechoensis Arctostaphylos peninsularis Peninsular manzanita Arctostaphylos pilosula La Panza manzanita Arctostaphylos pringlei pinkbracted manzanita Arctostaphylos pringlei Pringle manzanita

Arctostaphylos nummularia

Arctostaphylos pumila Arctostaphylos pungens

Arctostaphylos purissima

Arctostaphylos rainbowensis

Arctostaphylos refugioensisRefugio manzanitaArctostaphylos regismontanaKings Mountain manzanitaArctostaphylos rudisshagbark manzanitaArctostaphylos silvicolaBonny Doon manzanita

Arctostaphylos spp. Manzanita

Arctostaphylos stanfordianaRaiche's manzanitaArctostaphylos stanfordianaRincon manzanitaArctostaphylos stanfordianaStanford's manzanitaArctostaphylos tomentosabrittleleaf manzanitaArctostaphylos tomentosadacite manzanitaArctostaphylos tomentosarosy manzanita

Arctostaphylos tomentosa Santa Cruz Island Manzanita

Arctostaphylos tomentosa woollyleaf manzanita

Arctostaphylos uva-ursi kinnikinnick

Arctostaphylos virgata

Arctostaphylos viridissima

Arctostaphylos viscida

Arctostaphylos viscida

Arctostaphylos viscida

Arctostaphylos viscida

Bolinas manzanita

whitehair manzanita

Mariposa manzanita

sticky whiteleaf manzanita

Arctostaphylos wellsii Wells' manzanita

Arctotheca Capeweed Common Common Arctotheca calendula Capeweed (capeweeds, cape dandelion) Common Arctotheca spp. Arctotis arctotis Common Arctotis spp. (African daisy) Common Arctotis stoechadifolia African daisy Common

Aronia melanocarpa Chokeberry

Artemisia Common sagebrush Artemisia annua sweet sagewort Common Artemisia arbuscula little sagebrush Common Artemisia arctica boreal sagebrush Common Common Artemisia biennis biennial wormwood Artemisia bigelovii Bigelow sage Common Artemisia californica coastal sagebrush Common Artemisia campestris field sagewort Common Artemisia campestris field sagewort Common Artemisia campestris field sagewort Common

Artemisia cana silver sagebrush Common Artemisia douglasiana Douglas' sagewort Common Artemisia dracunculus tarragon Common Artemisia lindlevana Columbia River wormwood Common Artemisia Iudoviciana white sagebrush Common Artemisia ludoviciana white sagebrush Common Artemisia michauxiana Michaux's wormwood Common

Artemisia nesiotica island sagebrush Common
Artemisia norvegica Common

Artemisia novablack sagebrushCommonArtemisia palmeriSan Diego sagewortCommonArtemisia pycnocephalabeach wormwoodCommonArtemisia rothrockiitimberline sagebrushCommonArtemisia spinescensCommon

Artemisia spp. Common Artemisia suksdorfii coastal wormwood Common Artemisia tridentata basin big sagebrush Common Artemisia tridentata big sagebrush Common Artemisia tridentata Common mountain big sagebrush Artemisia tridentata Wyoming big sagebrush Common Artemisia vulgaris common wormwood Common Asparagus asparagus Occasional African asparagus fern Occasional Asparagus asparagoides

Asparagus densiflorusSprenger's asparagus fernOccasionalAsparagus officinalisgarden asparagusOccasionalAsparagus setaceuscommon asparagus fernOccasional

Occasional Asparagus spp. (asparagus, asparagus fern, smilax asparagus) Astartea spp. Aster intricatus Common Common Aster spp. (asters) Athyrium ladyfern Athyrium americanum alpine ladyfern Athyrium distentifolium Athyrium filix'femina Lady Fern Athyrium filix-femina common ladyfern Athyrium filix-femina subarctic ladyfern (aucuba, Himalaya laurel, Japanese laurel) Occasional Aucuba spp. Azara microphylla **Boxleaf Azara** Common Baccharis baccharis shortleaf baccharis Common Baccharis brachyphylla Baccharis douglasii saltmarsh baccharis Common Common Baccharis emoryi Emory's baccharis Baccharis glutinosa Common Baccharis malibuensis Malibu baccharis Common coyotebrush Baccharis pilularis Common Common Baccharis plummerae Plummer's baccharis Baccharis plummerae smooth baccharis Common Baccharis salicifolia mule's fat Common Baccharis sarothroides desertbroom Common Baccharis sergiloides desert baccharis Common Common Baccharis spp. (coyote brush, desert broom) Baccharis vanessae Encinitis false willow Common Banksia spp. (candle flowers) Common Begonia spp. (begonia) Occasional Berberis barberry Occasional Berberis aquifolium Occasional Berberis darwinii Darwin's berberis Occasional Berberis fremontii Occasional Berberis haematocarpa Occasional Occasional Berberis nervosa Berberis nevinii Occasional Occasional Berberis pinnata

Berberis repens Occasional Berberis spp. (barberry) Occasional Beta beet Occasional Beta spp. (beet) Occasional Beta vulgaris common beet Occasional Betula birch Occasional resin birch Occasional Betula glandulosa Birch Betula jacquemontii Occasional Betula nana dwarf birch Occasional Betula occidentalis water birch Occasional Betula pumila bog birch Occasional Occasional Betula pumila bog birch (birch) Occasional Betula spp.

Blandfordia spp. (Christmas bells)

Berberis pumila

Occasional

В	oronia spp.	(boronias)	Common
В	rassica	mustard	Occasional
В	rassica fruticulosa	Mediterranean cabbage	Occasional
В	rassica juncea	India mustard	Occasional
В	rassica napus	rape	Occasional
В	rassica nigra	black mustard	Occasional
В	rassica oleracea	cabbage	Occasional
В	rassica rapa	field mustard	Occasional
В	rassica spp.	(broccoli, cauliflower, cabbage, cress, kale, mustard, etc.)	Occasional
В	rassica tournefortii	Asian mustard	Occasional
В	<i>reynia</i> spp.	(snow bush)	Occasional
В	romus	brome	Occasional
В	romus alopecuros	weedy brome	Occasional
В	romus anomalus		Occasional
В	romus arenarius	Australian brome	Occasional
В	romus arizonicus	Arizona brome	Occasional
В	romus arvensis	field brome	Occasional
В	romus berteroanus	Chilean chess	Occasional
В	romus briziformis	rattlesnake brome	Occasional
В	romus carinatus	California brome	Occasional
В	romus catharticus	rescuegrass	Occasional
В	romus ciliatus	fringed brome	Occasional
В	romus ciliatus	fringed brome	Occasional
В	romus diandrus	ripgut brome	Occasional
В	romus erectus	erect brome	Occasional
В	romus grandis	tall brome	Occasional
В	romus hordeaceus	soft brome	Occasional
В	romus inermis	smooth brome	Occasional
В	romus laevipes	Chinook brome	Occasional
В	romus marginatus	mountain brome	Occasional
В	romus maritimus	seaside brome	Occasional
В	romus matritensis	compact brome	Occasional
В	romus orcuttianus	Orcutt's brome	Occasional
В	romus pacificus		Occasional
В	romus polyanthus	Great Basin brome	Occasional
В	romus porteri	Porter brome	Occasional
В	romus pseudolaevipes	coast range brome	Occasional
В	romus racemosus	bald brome	Occasional
В	romus richardsonii		Occasional
В	romus rubens	red brome	Occasional
В	romus scoparius	broom brome	Occasional
В	romus secalinus		Occasional
В	romus secalinus	rye brome	Occasional
В	romus sitchensis	Alaska brome	Occasional
В	romus spp.	(brome, bromegrass, chess, foxtail, rescuegrass)	Occasional
	romus stamineus	roadside brome	Occasional
В	romus sterilis	poverty brome	Occasional
В	romus subvelutinus	hoary brome	Occasional
В	romus suksdorfii	Suksdorf's brome	Occasional
В	romus tectorum	cheatgrass	Occasional

Bromus vulgaris Columbia brome Occasional Buddleia spp. (butterfly bush) Buddleja butterflybush Common Common Buddleja davidii orange eye butterflybush Buddleja saligna squarestem butterflybush Common Buddleja utahensis Utah butterflybush Common Bursaria spp. (black thorns, prickly box) Calendula marigold Common Calendula arvensis field marigold Common Calendula officinalis Common pot marigold Calendula spp. (calendula, marigold) Common Callistemon spp. Occasional Camellia spp. (camellia) Occasional Occasional Campsis campsis Occasional Campsis radicans trumpet creeper Occasional Campsis spp. (trumpet creeper, trumpet vine) Capsella capsella Occasional Capsella bursa-pastoris shepherd's purse Occasional Occasional Capsella spp. (shepard's purse) Occasional Capsicum pepper Capsicum annuum cayenne pepper Occasional Occasional Capsicum spp. Pepper Carduus plumeless thistle Common Carduus acanthoides spiny plumeless thistle Common Carduus nutans Common nodding plumeless thistle Common Carduus pycnocephalus Italian plumeless thistle Carduus spp. Common Carduus tenuiflorus winged plumeless thistle Common Carmichaelia spp. Very Common Carpobrotus carpobrotus Carpobrotus chilensis sea fig Carpobrotus edulis hottentot fig Carpobrotus spp. (golden shower, pink shower, rainbow shower, Cassia spp. Very Common gold medallion tree) Ceanothus ceanothus Occasional Ceanothus xarcuatus Occasional Ceanothus xbakeri Occasional Ceanothus xflexilis flexible ceanothus Occasional Ceanothus xlobbianus Occasional Ceanothus xlorenzenii Occasional Ceanothus xmendocinensis Mendocino ceanothus Occasional Ceanothus xotayensis Occasional Occasional Ceanothus xrugosus Cascade Lake ceanothus Ceanothus xserrulatus Occasional Ceanothus xvanrensselaeri Occasional Ceanothus xveitchianus Occasional Ceanothus arboreus feltleaf ceanothus Occasional Ceanothus confusus Rincon Ridge ceanothus Occasional Ceanothus connivens trailing buckbrush Occasional Ceanothus cordulatus whitethorn ceanothus Occasional

Ceanothus crassifolius hoaryleaf ceanothus Occasional Ceanothus cuneatus buckbrush Occasional Ceanothus cuneatus Monterey ceanothus Occasional Ceanothus cuneatus sedgeleaf buckbrush Occasional Ceanothus cvaneus San Diego buckbrush Occasional Ceanothus dentatus sandscrub ceanothus Occasional Calistoga ceanothus Occasional Ceanothus divergens Ceanothus diversifolius Occasional pinemat Ceanothus ferrisiae Occasional Coyote ceanothus Ceanothus foliosus Vine Hill ceanothus Occasional Ceanothus foliosus wavvleaf buckbrush Occasional Ceanothus foliosus wavyleaf ceanothus Occasional Occasional Ceanothus fresnensis Fresno mat Ceanothus gloriosus Mt. Vision ceanothus Occasional Point Reyes ceanothus Occasional Ceanothus gloriosus Ceanothus greggii desert ceanothus Occasional Ceanothus greggii Moiave ceanothus Occasional Ceanothus griseus Carmel ceanothus Occasional Ceanothus hearstiorum Hearst Ranch buckbrush Occasional Santa Barbara ceanothus Ceanothus impressus Occasional Ceanothus incanus coast whitethorn Occasional Ceanothus integerrimus deerbrush Occasional Ceanothus iepsonii Jepson ceanothus Occasional Ceanothus Iemmonii Lemmon's ceanothus Occasional Ceanothus leucodermis Occasional chaparral whitethorn Ceanothus maritimus maritime ceanothus Occasional Ceanothus masonii Mason's ceanothus Occasional Ceanothus megacarpus bigpod ceanothus Occasional Ceanothus megacarpus island ceanothus Occasional Ceanothus oliganthus hairy ceanothus Occasional Ceanothus ophiochilus Vail Lake ceanothus Occasional Palmer ceanothus Occasional Ceanothus palmeri Ceanothus papillosus wartleaf ceanothus Occasional Occasional Ceanothus parryi Parry ceanothus Ceanothus parvifolius littleleaf ceanothus Occasional Ceanothus pinetorum Coville ceanothus Occasional Occasional Ceanothus prostratus prostrate ceanothus Ceanothus pumilus dwarf ceanothus Occasional Ceanothus purpureus hollyleaf ceanothus Occasional Ceanothus roderickii Pine Hill buckbrush Occasional Ceanothus sanguineus redstem ceanothus Occasional Ceanothus sonomensis Sonoma ceanothus Occasional Ceanothus sorediatus iimbrush Occasional Occasional Ceanothus spinosus redheart Ceanothus spp. (buck brush, wild lilac) Occasional Ceanothus thyrsiflorus blueblossom Occasional Ceanothus tomentosus woolyleaf ceanothus Occasional Ceanothus velutinus Hooker's ceanothus Occasional Ceanothus velutinus snowbrush ceanothus Occasional Ceanothus verrucosus barranca brush Occasional Cedrus spp. (cedar)

CentranthuscentranthusOccasionalCentranthus ruberred valerianOccasionalCeratostigma spp.(Chinese plumbago)Occasional

Cestrum jessamine
Cestrum elegans Cestrum
Cestrum fasciculatum early jessamine
Cestrum nocturnum night jessamine
Cestrum parqui Chilean jessamine
Chaenomeles spp Flowering Quince

Cestrum parqui Flowering Quince Very Common Chaenomeles spp. Chamaecyparis cedar Occasional Chamaecyparis lawsoniana Port Orford cedar Occasional Chamaecyparis spp. (false cypress, Port Orford cedar) Occasional Chenopodium goosefoot Occasional Chenopodium album lambsquarters Occasional Chenopodium album lateflowering goosefoot Occasional Chenopodium album Missouri lambsquarters Occasional Chenopodium album Stevens' lambsquarters Occasional Chenopodium ambrosioides Mexican tea Occasional Chenopodium atrovirens pinyon goosefoot Occasional Chenopodium berlandieri pitseed goosefoot Occasional Chenopodium berlandieri pitseed goosefoot Occasional Chenopodium berlandieri Zschack's goosefoot Occasional Chenopodium botrvs Jerusalem oak goosefoot Occasional Chenopodium californicum California goosefoot Occasional Occasional Chenopodium capitatum blite goosefoot Chenopodium carnosulum ridged goosefoot Occasional Chenopodium chenopodioides low goosefoot Occasional Chenopodium desiccatum aridland goosefoot Occasional Chenopodium foliosum leafy goosefoot Occasional Chenopodium fremontii Fremont's goosefoot Occasional Chenopodium hians hians goosefoot Occasional Occasional Chenopodium humile marshland goosefoot Chenopodium incanum mealy goosefoot Occasional Chenopodium leptophyllum narrowleaf goosefoot Occasional Chenopodium macrospermum largeseed goosefoot Occasional Chenopodium macrospermum saltloving goosefoot Occasional cutleaf goosefoot Occasional Chenopodium multifidum Chenopodium murale nettleleaf goosefoot Occasional Chenopodium nevadense Nevada goosefoot Occasional Chenopodium opulifolium seaport goosefoot Occasional Chenopodium overi Over's goosefoot Occasional manyseed goosefoot Occasional Chenopodium polyspermum Chenopodium pratericola desert goosefoot Occasional

Occasional Chenopodium pumilio clammy goosefoot Chenopodium rubrum red goosefoot Occasional Chenopodium salinum Rocky Mountain goosefoot Occasional Chenopodium simplex mapleleaf goosefoot Occasional (fat-hen. lamb's quarters) Occasional Chenopodium spp. Chenopodium vulvaria stinking goosefoot Occasional Occasional Chenopodium watsonii Watson's goosefoot Chimonanthus spp. (Japanese allspice, wintersweet) Occasional

Common Choisya spp. (Mexican orange) Choisya ternata Mexican Orange Common Chrysanthemum daisy Common Chrysanthemum xmorifolium florist's daisy Common Chrysanthemum maxium Shasta Daisy Common Chrysanthemum spp. (chrysanthemums) Common Chrysanthemum x morifolium (florist mums) Common Cirsium thistle Common Cirsium andersonii rose thistle Common Franciscan thistle Cirsium andrewsii Common Cirsium arizonicum Arizona thistle Common Cirsium arvense Canada thistle Common Cirsium brevistylum clustered thistle Common Cirsium canescens Common Cirsium canovirens Common graygreen thistle Cirsium ciliolatum Ashland thistle Common Cirsium crassicaule slough thistle Common Cirsium cymosum peregrine thistle Common Cirsium douglasii Douglas' thistle Common Cirsium fontinale Chorro Creek Bog thistle Common Cirsium fontinale fountain thistle Common Mt Hamilton thistle Cirsium fontinale Common Cirsium hydrophilum Suisun thistle Common Cirsium hydrophilum Suisun thistle Common Cirsium hydrophilum Vasey's thistle Common Cirsium inamoenum Common Cirsium Ioncholepis la graciosa thistle Common Cirsium mohavense Mojave thistle Common Cirsium neomexicanum New Mexico thistle Common Cirsium occidentale cobwebby thistle Common Cirsium occidentale compact cobwebby thistle Common Common Cirsium occidentale snowy thistle Cirsium ochrocentrum yellowspine thistle Common Common Cirsium praeteriens Palo Alto thistle Cirsium quercetorum Alameda County thistle Common fewleaf thistle Cirsium remotifolium Common Cirsium rhothophilum surf thistle Common Cirsium scabrum rough thistle Common Cirsium scariosum meadow thistle Common Cirsium spp. (Arizona thistle, bull thistle, Canada thistle) Common Cirsium subniveum Jackson Hole thistle Common Cirsium undulatum wavyleaf thistle Common Cirsium vulgare bull thistle Common Lemon Common Citrus Limon Citrus paradisiaca Grapfruit Common Citrus sinensis Washington Navel Common Citrus spp. Citrus Common Clematis leather flower Common Clematis drummondii Common Clematis lasiantha Common pipestem clematis Clematis ligusticifolia California clematis Common Clematis ligusticifoliawestern white clematisCommonClematis paucifloraropevine clematisCommonClematis spp.(clematis, virgin's bower, lather flower, vaseCommon

vine

Clematis terniflorasweet autumn virginsbowerCommonClematis vitalbaevergreen clematisCommon

Clerodendron spp.

Clethra spp. (white alder, summer-sweet) Occasional Very Common Clianthus spp. (desert pea, glory pea, parrot's-beak) Convolvulus bindweed Occasional Convolvulus althaeoides mallow bindweed Occasional Convolvulus arvensis field bindweed Occasional Convolvulus equitans Texas bindweed Occasional Convolvulus spp. (field bindweed, dwarf morning-glory) Occasional Convolvulus tricolor Occasional dwarf morning-glory Conyza horseweed Common Conyza bonariensis asthmaweed Common Conyza canadensis Canadian horseweed Common Conyza floribunda asthmaweed Common

Common

Common

Conyza spp. (fleabane, horsethistle)
Coprosma mirrorplant

Coprosma repens creeping mirrorplant

Coprosma spp.

CordylinecordylineOccasionalCordyline australiscabbage treeOccasionalCordyline spp.(cabbage tree, dracaena, good-luck plant)OccasionalCoriaria spp.(tanner's tree)Occasional

Cornus dogwood

Cornus canadensis

Cornus glabrata brown dogwood
Cornus nuttallii Pacific dogwood
Cornus sericea redosier dogwood
Cornus sericea western dogwood
Cornus sessilis blackfruit dogwood

Cornus unalaschkensis western cordilleran bunchberry

Correa spp. Carmine Bells Common Very Common Cotoneaster cotoneaster Cotoneaster franchetii orange cotoneaster Very Common Cotoneaster lacteus milkflower cotoneaster Very Common Cotoneaster pannosus silverleaf cotoneaster Very Common Cotoneaster spp. Cotoneaster Very Common hawthorn Very Common Crataegus Crataegus douglasii black hawthorn Very Common oneseed hawthorn Crataegus monogyna Very Common Very Common Crataegus spp. (hawthorn) Crataegus suksdorfii Suksdorf's hawthorn Very Common Common Crocosmia crocosmia Crocosmia xcrocosmiiflora montbretia Common

Crocosmia spp. (montbretia)
Cryptomeria spp. (Japanese cedar)

Cryptostemma spp. (capeweed) Common

Cucumis melon

Cucumis anguria West Indian gherkin

Cucumis melo cantaloupe
Cucumis myriocarpus gooseberry gourd

Cucumis spp. (cantaloupe, cucumber, melon, muskmelon)

Cucurbita gourd Occasional Cucurbita digitata fingerleaf gourd Occasional Occasional Cucurbita ficifolia figleaf gourd Cucurbita foetidissima Missouri gourd Occasional Cucurbita palmata coyote gourd Occasional Cucurbita pepo field pumpkin Occasional Cucurbita pepo Occasional Cucurbita spp. (gourds, pumpkins, squashes) Occasional

CupressuscypressOccasionalCupressus abramsianaSanta Cruz Island cypressOccasionalCupressus arizonicaArizona cypressOccasional

Cupressus arizonica Arizona cypress Occasional Cupressus arizonica Cuyamaca cypress Occasional Occasional Cupressus arizonica Paiute cypress Occasional Cupressus bakeri Modoc cypress Cupressus forbesii tecate cypress Occasional Occasional Cupressus goveniana Gowen cypress Cupressus goveniana Gowen cypress Occasional Cupressus goveniana pygmy cypress Occasional

Occasional Cupressus guadalupensis Occasional Cupressus macnabiana MacNab's cypress Cupressus macrocarpa Monterey cypress Occasional Cupressus nootkatensis Alaska cedar Occasional Cupressus sargentii Sargent's cypress Occasional Cupressus spp. (cypress) Occasional Cydonia cydonia Very Common

Cydonia oblonga quince Very Common Cydonia spp. (quince) Very Common

Cyphomandra spp. (tamarillo, tree tomato, tomato tree)

Cytisus ×dallimorei broom Very Common Very Common Very Common

Cytisus multifloruswhite spanishbroomVery CommonCytisus scopariusScotch broomVery CommonCytisus spp.(genista, Scotch broom, Spanish broom, whiteVery Common

Spanish)
Cytisus striatus striated broom Very Common
Dahlia spp. (dahlia) Common
Datura jimsonweed Occasional

Datura discolor Occasional desert thorn-apple Datura inoxia pricklyburr Occasional Datura quercifolia Chinese thorn-apple Occasional (angel's trumpet, Jimson weed, thorn apple) Datura spp. Occasional Datura stramonium iimsonweed Occasional sacred thorn-apple Occasional Datura wrightii wild carrot Occasional Daucus Daucus carota Queen Anne's lace Occasional

Daucus pusillusAmerican wild carrotOccasionalDaucus spp.(carrot, Queen Anne's lace)Occasional

Dendromecontree poppyDendromecon californicaBush Poppy

Dendromecon harfordii Harford's tree poppy

Dendromecon rigida tree poppy

Deutzia spp. Deutzia Occasional Diospyros Occasional diospyros Diospyros spp. (ebony, persimmon) Occasional Occasional Diospyros virginiana common persimmon Dodonaea dodonaea Occasional Dodonaea spp. ((hop bush, hopseed bush) Occasional Dodonaea viscosa Florida hopbush Occasional Duchesnea duchesnea Very Common Duchesnea indica Indian strawberry Very Common

Snow Mountain willowherb

ElaeagnuselaeagnusElaeagnus angustifoliaRussian oliveElaeagnus pungensSilberberryEpilobiumwillowherb

Epilobium anagallidifolium pimpernel willowherb Epilobium brachycarpum tall annual willowherb hummingbird trumpet Epilobium canum Epilobium ciliatum fringed willowherb Epilobium ciliatum fringed willowherb fringed willowherb Epilobium ciliatum talus willowherb Epilobium clavatum Epilobium cleistogamum selfing willowherb Epilobium densiflorum denseflower willowherb Epilobium foliosum California willowherb Epilobium glaberrimum glaucus willowherb Epilobium halleanum glandular willowherb Hornemann's willowherb Epilobium hornemannii Epilobium hornemannii Hornemann's willowherb Yuba Pass willowherb Epilobium howellii Epilobium lactiflorum milkflower willowherb bog willowherb Epilobium leptophyllum Epilobium luteum yellow willowherb Epilobium minutum chaparral willowherb

Epilobium obcordatum rockfringe

Epilobium nivium

Epilobium oreganum Grants Pass willowherb
Epilobium oregonense Oregon willowherb

Epilobium pallidum largeflower spike-primrose

Epilobium palustre marsh willowherb
Epilobium pygmaeum smooth spike-primrose

Epilobium rigidum stiff willowherb

Epilobium saximontanum Rocky Mountain willowherb

Epilobium septentrionale northern willowherb Epilobium siskiyouense Siskiyou willowherb

Epilobium spp. (fireweed)

Epilobium torreyi Torrey's willowherb

Erica heath Common Common Erica Iusitanica Spanish heath Erica spp. (heath, heather) Common Eriobotrya loquat Very Common Eriobotrya japonica loquat Very Common Eriobotrya spp. (loquat) Very Common Eriostemon spp. (pink star, wax flower) Common **Erodium** stork's bill Occasional Erodium botrys longbeak stork's bill Occasional shortfruit stork's bill Occasional Erodium brachycarpum Erodium cicutarium redstem stork's bill Occasional Erodium cygnorum Australian stork's bill Occasional Erodium macrophyllum California stork's bill Occasional roundleaf stork's bill Occasional Erodium macrophyllum Erodium malacoides Mediterranean stork's bill Occasional Erodium moschatum musky stork's bill Occasional Erodium spp. (cranesbill, filaree) Occasional Erodium texanum Texas stork's bill Occasional Escallonia Occasional redclaws Escallonia compacta Escallonia Occasional Escallonia rubra redclaws Occasional Occasional Escallonia spp. Eucalyptus Primary gum Eucalyptus xmortoniana Primary Eucalyptus camaldulensis river redgum Primary Eucalyptus cladocalyx Primary sugargum Eucalyptus globulus Tasmanian bluegum Primary Eucalyptus polyanthemos redbox Primary Eucalyptus pulverulenta silverleaf mountain gum Primary Eucalyptus sideroxylon red ironbark Primary Eucalyptus spp. (eucalyptus, gum trees) Primary Eucalyptus tereticornis forest redgum Primary Eucalyptus torquata coral gum Primary Eucalyptus viminalis manna gum Primary Eugenia stopper Occasional Eugenia apiculata shortleaf stopper Occasional (cherry of the Rio Grande, Lilly Pilly, Surinam Occasional Eugenia spp. cherry) spindletree Occasional Euonymus Euonymus occidentale western burning bush Occasional Euonymus occidentalis Occasional Euonymus spp. (euonymus, spindle tree) Occasional Euphorbia spurge Euphorbia characias Albanian spurge Euphorbia crenulata Chinese caps Euphorbia cyathophora fire on the mountain Euphorbia cyparissias cypress spurge Euphorbia davidii David's spurge Euphorbia dendroides tree spurge Euphorbia dentata toothed spurge Euphorbia eriantha beetle spurge

Euphorbia esula leafy spurge Euphorbia exigua dwarf spurge Euphorbia exstipulata squareseed spurge Euphorbia helioscopia madwoman's milk Euphorbia heterophylla Mexican fireplant Euphorbia lathyris moleplant

Euphorbia marginata snow on the mountain

Euphorbia misera cliff spurge Euphorbia myrsinites myrtle spurge Euphorbia oblongata eggleaf spurge Euphorbia palmeri woodland spurge Euphorbia peplus petty spurge

Euphorbia rigida upright myrtle spurge Euphorbia schizoloba Mojave spurge Euphorbia serrata serrate spurge Euphorbia spathulata warty spurge

Euphorbia spp. (euphorbia, spurges) Euphorbia terracina Geraldton carnation weed

Euphorbia tirucalli Indiantree spurge

Occasional Fagus spp. (beech) Feijoa sellowiana Pineapple Guava Primary Feijoa spp. (feijoa, pineapple guava) Primary **Ficus** Occasional fig Ficus carica edible fig Occasional Ficus palmata Occasional Punjab fig Occasional Ficus rubiginosa Port Jackson fig Ficus spp. Climbing Fig Occasional Forsythia spp. (forsythias) Occasional Fortunella kumquat Common Fortunella japonica round kumquat Common Common

Very Common Fragaria strawberry Fragaria xananassa Very Common

(kumquats)

Fragaria xbringhurstii Very Common Fragaria chiloensis beach strawberry Very Common Fragaria chiloensis Very Common Pacific beach strawberry (strawberry) Very Common Fragaria spp. Fragaria vesca California strawberry Very Common Fragaria vesca woodland strawberry Very Common

Virginia strawberry

Fraxinus ash

Fortunella spp.

Fragaria virginiana

Fraxinus anomala singleleaf ash Fraxinus dipetala California ash Fraxinus latifolia Oregon ash Fraxinus spp. (ash) Fraxinus uhdei shamel ash Fraxinus velutina velvet ash

Fuchsia fuchsia Occasional Fuchsia boliviana Bolivian fuchsia Occasional Fuchsia hybrida hybrid fuchsia Occasional Occasional Fuchsia magellanica hardy fuchsia

Very Common

Fuchsia paniculatashrubby fuchsiaOccasionalFuchsia spp.FuchsiaOccasionalFumariafumitory

Fumaria capreolata white ramping fumitory

Fumaria officinalisdrug fumitoryFumaria parviflorafineleaf fumitoryFumaria spp.(fumitory)

Garrya silktassel Occasional Garrya buxifolia dwarf silktassel Occasional Garrya congdonii chaparral silktassel Occasional Garrya elliptica wavyleaf silktassel Occasional Garrya flavescens ashy silktassel Occasional Garrya fremontii bearbrush Occasional Occasional Garrya spp. (silk-tassel) Garrya veatchii canyon silktassel Occasional Gelsemium spp. (Carolina jessamine) Occasional Genista broom Very Common Genista aetnensis Mt. Etna broom Very Common Genista canariensis Canary broom Very Common Genista linifolia Mediterranean broom Very Common Genista maderensis Madeira Dyer's greenweed Very Common

Genista monspessulanaFrench broomVery CommonGenista spp.(brooms)Very CommonGenista stenopetalaleafy broomVery CommonGeraniumgeraniumOccasionalGeranium bicknelliiBicknell's cranesbillOccasional

Geranium californicum California cranesbill Occasional Geranium carolinianum Carolina geranium Occasional Geranium carolinianum Carolina geranium Occasional Geranium carolinianum Carolina geranium Occasional Occasional Geranium columbinum longstalk cranesbill Geranium dissectum Occasional cutleaf geranium Geranium homeanum Australasian geranium Occasional Geranium lucidum Occasional

Geranium lucidum shining geranium Occasional dovefoot geranium Occasional Occasional

Occasional Geranium nervosum Occasional Geranium oreganum Oregon geranium Geranium palmatum Canary Island geranium Occasional Geranium potentilloides cinquefoil geranium Occasional Geranium pusillum small geranium Occasional Geranium pyrenaicum hedgerow geranium Occasional Geranium retrorsum New Zealand geranium Occasional Geranium richardsonii Richardson's geranium Occasional

Geranium robertianum Occasional Geranium robertianum Robert geranium Occasional Geranium robertianum Robert geranium Occasional Geranium rotundifolium roundleaf geranium Occasional Geranium sibiricum Siberian geranium Occasional Geranium solanderi Solander's geranium Occasional

Geranium spp.(cranesbill)OccasionalGeranium texanumTexas geraniumOccasional

Geranium viscosissimumsticky purple geraniumOccasionalGerbera spp.(Transvaal daisy)CommonGomphocarpus spp.(cotton bush, hairy balls, wild cotton)OccasionalGrevillea spp.(hummingbird bush, grevilleas, silky-oak)Occasional

Gypsophila baby's-breath

Gypsophila elegans showy baby's-breath

Gypsophila paniculata baby's breath

Gypsophila scorzonerifolia garden baby's-breath
Gypsophila spp. (baby's-breath)
Hakea spp. (pincushion tree)

Hakea spp.(pincushion tree)OccasionalHaloragisseaberryOccasionalHaloragis erectaerect seaberryOccasionalHaloragis spp.(erect seaberry, seaberry)OccasionalHardenbergia spp.(coral pea, lilac vine)Hebe spp. (hebe)Very Common

Occasional

Occasional

Hebe hebe

Hebe xfranciscana

Hebe speciosa New Zealand hebe Occasional Hedera Occasional Hedera canariensis Occasional Canary ivy Hedera helix Occasional English ivy Hedera spp. (ivy) Occasional Helianthus Common sunflower Helianthus annuus common sunflower Common Helianthus bolanderi serpentine sunflower Common

Helianthus californicus California sunflower Common Helianthus ciliaris Texas blueweed Common Helianthus cusickii Cusick's sunflower Common Helianthus gracilentus slender sunflower Common Helianthus maximiliani Maximilian sunflower Common Helianthus niveus Algodones sunflower Common Helianthus niveus Common showy sunflower Helianthus nuttallii Nuttall's sunflower Common Helianthus nuttallii Parish's sunflower Common Helianthus petiolaris Common prairie sunflower Helianthus spp. (Jerusalem artichoke, sunflower) Common Jerusalem artichoke Helianthus tuberosus Common strawflower Common Helichrysum

Helichrysum petiolarelicorice-plantCommonHelichrysum spp.(curry plant, licorice plant, straw flower)Common

Heteromeles toyon

Heteromeles arbutifolia Heteromeles salicifolia

HibiscusrosemallowHibiscus denudatuspalefaceHibiscus lasiocarposrosemallowHibiscus spp.HibiscusHibiscus syriacusHibiscus

Hibiscus trionum flower of an hour

HoheriaOccasionalHoheria populnealacebarkOccasionalHoheria spp.(lacebark)Occasional

A-18

Holcus Occasional velvetgrass Holcus lanatus common velvetgrass Occasional Holcus mollis creeping velvetgrass Occasional Occasional Holcus spp. (velvet grass) Humulus hop Primary Humulus lupulus common hop Primary Primary Humulus spp. (hops) Oak Leaf Hydrangea Hydrangea quercifolia Common Hypericum St. Johnswort Common Hypericum anagalloides tinker's penny Hypericum androsaemum sweet-amber Common Hypericum calycinum Aaron's beard Common Hypericum canariense Canary Island St. Johnswort Common Common goldwire Hypericum concinnum Hooker's St. Johnswort Common Hypericum hookerianum dwarf St. Johnswort Hypericum mutilum Common Hypericum perforatum common St. Johnswort Common Hypericum scouleri Scouler's St. Johnswort Common Hypericum spp. (Aaron's beard, sweet-amber, St John's wort) Common llex holly Occasional llex xattenuata topal holly Occasional Ilex aquifolium English holly Occasional llex spp. (holly) Occasional Iris iris Occasional Occasional Iris bracteata Siskiyou iris Occasional Iris chrysophylla yellowleaf iris Iris douglasiana Douglas iris Occasional Iris fernaldii Fernald's iris Occasional Iris foetidissima stinking iris Occasional Iris germanica German iris Occasional Occasional Iris hartwegii rainbow iris Iris innominata Del Norte County iris Occasional Iris longipetala Occasional bowltube iris Occasional Iris macrosiphon Iris missouriensis Rocky Mountain iris Occasional Iris munzii Munz's iris Occasional Iris orientalis yellowband iris Occasional Iris pseudacorus paleyellow iris Occasional Iris purdyi Purdy's iris Occasional Iris sibirica Siberian iris Occasional Iris spp. (iris) Occasional Iris spuria seashore iris Occasional Iris tenax Klamath iris Occasional Iris tenax Occasional toughleaf iris Iris tenuissima longtube iris Occasional Iris thompsonii Thompson's iris Occasional Jasminum spp. (jasmine) Occasional walnut Occasional Juglans Southern California walnut Juglans californica Occasional Juglans hindsii Northern California walnut Occasional Occasional Juglans regia English walnut

Juglans spp. (California black walnut, butternut, English Occasional

walnut)

Juncus rush

Juncus acuminatustapertip rushJuncus acutusLeopold's rushJuncus acutusspiny rushJuncus ambiguusseasice rushJuncus arcticusBaltic rushJuncus articulatusjointleaf rush

Juncus balticus

Juncus bolanderiBolander's rushJuncus brachyphyllustuftedstem rushJuncus breweriBrewer's rushJuncus bryoidesmoss rushJuncus bufoniustoad rush

Juncus capillaris hairystem dwarf rush Juncus capitatus leafybract dwarf rush Juncus chlorocephalus greenhead rush Juncus confusus Colorado rush Juncus cooperi Cooper's rush Juncus covillei Coville's rush Juncus cyperoides Forbestown rush Juncus diffusissimus slimpod rush Juncus drummondii Drummond's rush Juncus drummondii threeflower rush Juncus dubius dubius rush Juncus dudleyi Dudley's rush Juncus duranii Duran's rush Juncus effusus common rush Juncus effusus lamp rush Juncus effusus Pacific rush Juncus ensifolius swordleaf rush Juncus falcatus falcate rush

Juncus hemiendytusHerman's dwarf rushJuncus hemiendytusHerman's dwarf rush

Juncus howellii Howell's rush

Juncus kelloggiiKellogg's dwarf rushJuncus leiospermusAhart's dwarf rushJuncus leiospermusRed Bluff dwarf rush

Juncus lesueurii salt rush
Juncus longistylis longstyle rush

Juncus luciensis Santa Lucia dwarf rush

Juncus macrandrus longanther rush Juncus macrophyllus longleaf rush Juncus marginatus grassleaf rush Juncus mertensianus Mertens' rush Juncus mexicanus Mexican rush Juncus nevadensis Sierra rush stout rush Juncus nodatus Juncus nodosus knotted rush Juncus occidentalis western rush

Juncus orthophyllusstraightleaf rushJuncus oxymerispointed rushJuncus parryiParry's rushJuncus patensspreading rushJuncus phaeocephalusbrownhead rushJuncus regeliiRegel's rushJuncus rugulosuswrinkled rush

Juncus saximontanus Rocky Mountain rush

Juncus spp. (rush)

Juncus supiniformishairyleaf rushJuncus tenuispoverty rushJuncus textilisbasket rushJuncus tiehmiiNevada rushJuncus torreyiTorrey's rush

Juncus triformis Yosemite dwarf rush

Juncus uncialis twelfth rush
Juncus xiphioides irisleaf rush

Kerria spp. (Japanese kerria) Very Common

Kunzea spp. (Burgan)

Lathyrus odoratus

Laburnumgolden chain treeVery CommonLaburnum anagyroidesgolden chain treeVery CommonLaburnum spp.(bean treegolden-chain)Very Common

Lagerstroemia indica Crape Myrtle

Lagunaria spp. (cow itch tree, Hercules' club, white field gourd)

Occasional Lantana lantana lantana Occasional Lantana camara Lantana montevidensis trailing shrubverbena Occasional Lantana spp. Lantana Occasional Lantana urticoides West Indian shrubverbena Occasional Lathyrus pea Very Common Lathyrus angulatus angled pea Very Common Lathyrus aphaca yellow pea Very Common Lathyrus biflorus twoflower pea Very Common Lathyrus bijugatus drypark pea Very Common Lathyrus cicera red pea Very Common Very Common Lathyrus delnorticus Del Norte pea Very Common Lathyrus glandulosus redwood pea Lathyrus hirsutus Caley pea Very Common Lathyrus hitchcockianus Bullfrog Mountain pea Very Common beach pea Lathyrus japonicus Very Common Lathyrus japonicus beach pea Very Common California pea Very Common Lathyrus jepsonii Lathyrus jepsonii Delta tule pea Very Common Very Common Lathyrus lanszwertii Brown's pea Lathyrus lanszwertii Lanszwert's pea Very Common Lathyrus lanszwertii Nevada pea Very Common Lathyrus lanszwertii Tracy's pea Very Common Lathyrus latifolius perennial pea Very Common Lathyrus littoralis silky beach pea Very Common Very Common Lathyrus nevadensis Sierra pea

sweetpea

Very Common

Lathyrus palustris marsh pea Very Common Lathyrus polyphyllus leafy pea Very Common Lathyrus rigidus stiff pea Very Common Lathyrus sativus white pea Very Common Lathyrus sphaericus grass pea Very Common Lathyrus splendens pride of California Very Common Lathyrus spp. Very Common (sweet pea) Lathyrus sulphureus snub pea Very Common Lathyrus tingitanus Tangier pea Very Common Lathyrus torreyi Torrey's pea Very Common Lathyrus vestitus Alefeld's pea Very Common Lathyrus vestitus Bolander's pea Very Common Lathyrus vestitus Pacific pea Very Common Laurus Occasional laurel Laurus nobilis Sweet Bay Occasional Laurus nobilis Occasional Sweet Bay Laurus spp. (Grecian laurel, sweet bay) Occasional Lavandula lavender Lavandula spp. Lavandula stoechas French lavender Leptospermum teatree Occasional Australian teatree Occasional Leptospermum laevigatum Leptospermum spp. (tea trees) Occasional Leucadendron spp. Primary Ligustrum privet Ligustrum lucidum Primary Ligustrum ovalifolium California privet Primary Ligustrum spp. (privet) Primary Lilium lily Occasional Lilium bolanderi Bolander's lily Occasional Lilium columbianum Columbia lily Occasional Lilium humboldtii Humboldt lily Occasional Lilium humboldtii Humboldt's lily Occasional Lilium kelleyanum

Kelley's lily

coast lily

western lily

leopard lily

Shasta lily

Vollmer's lily

Wiggins' lily

Sierra tiger lily

redwood lily

Cascade lily

washington lily

Washington lily

(lilies)

flax

pale flax

lemon lily

Pitkin Marsh lily

Kellogg's lily

Lilium kelloggii

Lilium maritimum

Lilium occidentale

Lilium pardalinum

Lilium pardalinum

Lilium pardalinum

Lilium pardalinum

Lilium pardalinum

Lilium parryi

Lilium spp.

I inum

Linum bienne

Lilium parvum

Lilium rubescens

Lilium washingtonianum

Lilium washingtonianum

Lilium washingtonianum

A-22

Occasional

Occasional

Occasional

Occasional

Occasional

Occasional

Occasional

Occasional Occasional

Occasional

Occasional

Occasional

Occasional

Occasional

Occasional Occasional

Occasional

Occasional

Linum grandiflorum flowering flax Occasional Linum lewisii Lewis flax Occasional I inum lewisii prairie flax Occasional Linum puberulum plains flax Occasional Linum spp. (flax) Occasional Linum trigynum French flax Occasional Linum usitatissimum common flax Occasional Litchi spp. Primary Lomandra spp. (mat-rush nyalla, tanika) Common Lonicera honeysuckle Occasional Lonicera caerulea bluefly honeysuckle Occasional Lonicera caerulea sweetberry honeysuckle Occasional Occasional Lonicera ciliosa orange honeysuckle Occasional Lonicera conjugialis purpleflower honeysuckle Lonicera etrusca Etruscan honeysuckle Occasional Lonicera hispidula pink honeysuckle Occasional Lonicera interrupta chaparral honeysuckle Occasional Lonicera involucrata black twinberry Occasional Occasional Lonicera involucrata fly honeysuckle Occasional Lonicera japonica Honeysuckle Lonicera japonica Honeysuckle Occasional Occasional Lonicera spp. (honeysuckles) Lonicera subspicata Johnston's honeysuckle Occasional Lonicera subspicata Santa Barbara honeysuckle Occasional Occasional Lonicera subspicata southern honeysuckle Occasional Lonicera tatarica Tatarian honeysuckle Loropetalum chinense Loropetalum Lotus trefoil Very Common Lotus aboriginus rosy bird's-foot trefoil Very Common Lotus angustissimus slender bird's-foot trefoil Very Common Very Common Lotus argophyllus Fremont's birsfoot trefoil Santa Cruz Island silverhosackia Lotus argophyllus Very Common Lotus argophyllus Santa Cruz Island silverhosackia Very Common Very Common Lotus argophyllus silver bird's-foot trefoil Lotus argyraeus canyon bird's-foot trefoil Very Common Lotus benthamii Bentham's broom Very Common Lotus corniculatus bird's-foot trefoil Very Common Lotus crassifolius big deervetch Very Common Lotus dendroideus island broom Very Common Lotus dendroideus Trask's island broom Very Common Lotus dendroideus Veatch's island broom Very Common Lotus denticulatus riverbar bird's-foot trefoil Very Common Lotus formosissimus seaside bird's-foot trefoil Very Common narrow-leaf bird's-foot trefoil Very Common Lotus glaber Lotus grandiflorus chaparral bird's-foot trefoil Very Common Lotus hamatus San Diego bird's-foot trefoil Very Common rock bird's-foot trefoil Lotus haydonii Very Common Lotus heermannii Heermann's bird's-foot trefoil Very Common Lotus humistratus foothill deervetch Very Common Lotus incanus woolly bird's-foot trefoil Very Common Lotus junceus Biolett's rush broom Very Common

Lotus junceus	rush broom	Very Common
Lotus micranthus	desert deervetch	Very Common
Lotus nevadensis	Davidson's bird's-foot trefoil	Very Common
Lotus nevadensis	Douglas' bird's-foot trefoil	Very Common
Lotus nevadensis	Nevada bird's-foot trefoil	Very Common
Lotus nuttallianus	wire bird's-foot trefoil	Very Common
Lotus oblongifolius	streambank bird's-foot trefoil	Very Common
Lotus pedunculatus	big trefoil	Very Common
Lotus pinnatus	meadow bird's-foot trefoil	Very Common
Lotus procumbens	Jepson's deerweed	Very Common
Lotus procumbens	silky deerweed	Very Common
Lotus rigidus	shrubby deervetch	Very Common
Lotus rubriflorus	redflower bird's-foot trefoil	Very Common
Lotus salsuginosus	coastal bird's-foot trefoil	Very Common
Lotus scoparius	common deerweed	Very Common
Lotus scoparius	western bird's-foot trefoil	Very Common
Lotus spp.	(bird's-foot trefoil, parrot's-beak, winged pea)	Very Common
Lotus stipularis	balsam bird's-foot trefoil	Very Common
Lotus stipularis	Ottley's bird's-foot trefoil	Very Common
Lotus strigosus	strigose bird's-foot trefoil	Very Common
Lotus unifoliolatus	American bird's-foot trefoil	Very Common
Lotus wrangelianus	Chilean bird's-foot trefoil	Very Common
Lotus yollabolliensis	Yolla Bolly bird's-foot trefoil	Very Common
Luma apiculata	·	•
Lupinus	lupine	Very Common
Lupinus ×alpestris	Great Basin lupine	Very Common
Lupinus ×cymba-egressus		Very Common
Lupinus ×inyoensis		Very Common
Lupinus abramsii	Abrams' lupine	Very Common
Lupinus adsurgens	Drew's silky lupine	Very Common
Lupinus affinis	fleshy lupine	Very Common
Lupinus agardhianus	Agardh lupine	Very Common
Lupinus albicaulis	Shasta lupine	Very Common
Lupinus albicaulis	sicklekeel lupine	Very Common
Lupinus albifrons	Douglas' silver lupine	Very Common
Lupinus albifrons	silver lupine	Very Common
Lupinus andersonii	Anderson's lupine	Very Common
Lupinus angustiflorus	narrowflower lupine	Very Common
Lupinus antoninus	Anthony Peak lupine	Very Common
Lupinus apertus	summit lupine	Very Common
Lupinus arboreus	yellow bush lupine	Very Common
Lupinus arbustus	longspur lupine	Very Common
Lupinus argenteus	silvery lupine	Very Common
Lupinus aridus	desert lupine	Very Common
Lupinus arizonicus	Arizona lupine	Very Common
Lupinus benthamii	spider lupine	Very Common
Lupinus bicolor	miniature lupine	Very Common
Lupinus brevicaulis	shortstem lupine	Very Common
Lupinus brevior	short lupine	Very Common
Lupinus breweri	Brewer's lupine	Very Common
Lupinus breweri	matted lupine	Very Common

Lupinus caespitosus stemless dwarf lupine Very Common Lupinus caespitosus Utah lupine Very Common Lupinus caudatus Kellogg's spurred lupine Very Common Lupinus caudatus tailcup lupine Very Common Lupinus cervinus Santa Lucia Iupine Very Common Very Common Lupinus chamissonis chamisso bush lupine Lupinus citrinus orangeflower lupine Very Common Lupinus citrinus orangeflower lupine Very Common Lupinus concinnus bajada lupine Very Common Orcutt's lupine Very Common Lupinus concinnus Lupinus confertus crowded lupine Very Common Very Common Lupinus congdonii Congdon's lupine Lupinus constancei lassicus lupine Very Common Very Common Lupinus covillei shaggy lupine Lupinus croceus Mt. Eddy lupine Very Common Very Common Lupinus culbertsonii Hoskett Meadows lupine Lupinus dalesiae Quincy lupine Very Common Lupinus densiflorus whitewhorl lupine Very Common Very Common Lupinus duranii Mono Lake lupine Very Common Lupinus elatus tall silky lupine Lupinus elmeri Elmer's lupine Very Common Lupinus excubitus Very Common grape soda lupine Lupinus excubitus Hall's bush lupine Very Common Lupinus excubitus interior bush lupine Very Common Very Common Lupinus excubitus mountain bush lupine Very Common Lupinus excubitus Mountain Springs bush lupine Lupinus eximius San Mateo tree lupine Very Common Lupinus flavoculatus yelloweyes Very Common Lupinus formosus summer lupine Very Common Lupinus fulcratus greenstipule lupine Very Common green slender lupine Very Common Lupinus gracilentus Sierra Iupine Very Common Lupinus grayi Lupinus guadalupensis Guadalupe Island lupine Very Common Lupinus hirsutissimus stinging annual lupine Very Common Lupinus holmgrenianus Holmgren's lupine Very Common Lupinus horizontalis sunset lupine Very Common Lupinus hyacinthinus San Jacinto Iupine Very Common Lupinus Iapidicola Heller's dwarf lupine Very Common Lupinus latifolius broadleaf lupine Very Common Lupinus lepidus Very Common Lupinus leucophyllus velvet lupine Very Common Lupinus littoralis seashore lupine Very Common Lupinus longifolius longleaf bush lupine Very Common Lupinus Iudovicianus San Luis Iupine Very Common Lupinus luteolus pale yellow lupine Very Common Lupinus Iyallii dwarf mountain lupine Very Common Lupinus magnificus Panamint Mountain lupine Very Common Lupinus meionanthus Lake Tahoe lupine Very Common Lupinus microcarpus Very Common Lupinus nanus Menker's lupine Very Common Very Common Lupinus nanus sky lupine

Lupinus nevadensis Nevada lupine Very Common Lupinus nipomensis Nipomo Mesa Iupine Very Common Lupinus obtusilobus bluntlobe lupine Very Common Very Common Lupinus odoratus Mojave royal lupine Lupinus onustus Plumas lupine Very Common Very Common Lupinus pachylobus Mt. Diablo lupine Lupinus padre-crowleyi Dedecker lupine Very Common Lupinus pallidus pale desert lupine Very Common Lupinus palmeri bluebonnet lupine Very Common Very Common Lupinus peirsonii long lupine Lupinus polycarpus smallflower lupine Very Common Very Common Lupinus polyphyllus bigleaf lupine Lupinus pratensis Inyo Meadow lupine Very Common Very Common Lupinus prunophilus hairy bigleaf lupine Lupinus punto-reyesensis Point reyes lupine Very Common Very Common Lupinus purpurascens Yuba lupine Lupinus pusillus Intermountain lupine Very Common Lupinus pusillus rusty lupine Very Common riverbank lupine Lupinus rivularis Very Common Very Common Lupinus ruber red lupine Lupinus saxosus rock lupine Very Common Very Common Lupinus sellulus Donner Lake lupine Lupinus sericatus Cobb Mountain lupine Very Common Lupinus sericeus Very Common Very Common Lupinus shockleyi purple desert lupine Very Common Lupinus sparsiflorus Mojave lupine Lupinus sparsiflorus Pond's Mojave Iupine Very Common shaggyhair lupine Lupinus spectabilis Very Common Lupinus spp. (lupines) Very Common Lupinus stiversii harlequin annual lupine Very Common Mono lupine Very Common Lupinus sublanatus Very Common Lupinus subvexus valley lupine Lupinus succulentus hollowleaf annual lupine Very Common Lupinus tidestromii Tidestrom's lupine Very Common Lupinus tidestromii Tidestrom's lupine Very Common Lupinus tracyi Tracy's lupine Very Common Lupinus truncatus collared annual lupine Very Common Lupinus uncialis inchhigh lupine Very Common Lupinus vallicola open lupine Very Common Lupinus variicolor Very Common Lupinus versicolor manycolored lupine Very Common Lycopersicom spp. Macadamia spp. (macadamia) Occasional Magnolia spp. Occasional Magnolia Malus apple Very Common Malus fusca Oregon crabapple Very Common Malus pumila paradise apple Very Common Malus spp. Apple Very Common Malus spp. Flowering CrabApple Very Common Malva mallow Occasional Occasional Malva assurgentiflora

Malva moschata musk mallow Occasional Malva neglecta common mallow Occasional Malva nicaeensis bull mallow Occasional cheeseweed mallow Malva parviflora Occasional Malva pusilla low mallow Occasional Malva spp. (mallow) Occasional Malva sylvestris high mallow Occasional Malva verticillata cluster mallow Occasional Mangifera spp. Occasional (mango) Medicago alfalfa Very Common Medicago arabica spotted medick Very Common black medick Medicago lupulina Very Common Medicago minima burr medick Very Common blackdisk medick Medicago orbicularis Very Common Medicago polymorpha burclover Very Common Mediterranean medick Medicago praecox Very Common Medicago sativa alfalfa Very Common Medicago sativa yellow alfalfa Very Common Very Common Medicago spp. (alfalfa, bur clover, yellow trefoil) Occasional Melaleuca quinquenervia Paperback Melaleuca Melaleuca spp. (honey myrtle, bottlebrush) Occasional Melilotus sweetclover Very Common Melilotus indicus annual vellow sweetclover Very Common Melilotus officinalis yellow sweetclover Very Common Melilotus spp. Very Common Mentha Occasional mint Mentha xpiperita peppermint Occasional Mentha xvillosa Occasional Mentha aquatica water mint Occasional Mentha arvensis wild mint Occasional Mentha canadensis Occasional Mentha pulegium Occasional pennyroyal Mentha spicata spearmint Occasional Mentha spp. Occasional Mint Mentha suaveolens apple mint Occasional Occasional Mesembryanthemum iceplant Occasional Mesembryanthemum crystallinum common iceplant Mesembryanthemum nodiflorum slenderleaf iceplant Occasional Mesembryanthemum spp. (ice plant) Occasional Metrosideros spp. (bottlebrush, iron tree, New Zealand Christmas Occasional tree) Michelia spp. (michelia) Occasional (broomheaths) Occasional Monotoca spp. maidenhair vine Muehlenbeckia Muehlenbeckia complexa maidenhair vine Muehlenbeckia hastatula wirevine (maidenhair vine, wire plant) Muehlenbeckia spp. Myoporum myoporum Myoporum laetum ngaio tree Myoporum spp. (myoporum, Ngaio-tree) Myosotis forget-me-not Occasional

Myosotis azorica Occasional Azores forget-me-not Myosotis discolor changing forget-me-not Occasional Myosotis latifolia broadleaf forget-me-not Occasional Myosotis laxa bay forget-me-not Occasional Myosotis scorpioides true forget-me-not Occasional Myosotis spp. (forget-me-not, scorpion grass) Occasional Occasional Myosotis stricta strict forget-me-not Myosotis sylvatica woodland forget-me-not Occasional Occasional Myosotis verna spring forget-me-not Myrica sweetgale California Myrtle Myrica californica Myrica hartwegii Sierra bayberry Myrtus communis Myrtle Nemesia spp. (nemesia) Occasional Olea olive Olive Olea europaea Olea spp. Olive Opuntia pricklypear Occasional Opuntia xcurvospina searchlight pricklypear Occasional Occasional Opuntia xdemissa Opuntia xoccidentalis Occasional Vasey's coastal pricklypear Occasional Opuntia xvaseyi Opuntia basilaris beavertail pricklypear Occasional Opuntia basilaris beavertail pricklypear Occasional Occasional Opuntia basilaris Trelease's beavertail pricklypear Opuntia chlorotica dollarjoint pricklypear Occasional Opuntia engelmannii cactus apple Occasional Opuntia engelmannii cactus apple Occasional Opuntia ficus-indica Barbary fig Occasional Opuntia fragilis brittle pricklypear Occasional Opuntia littoralis coastal pricklypear Occasional Occasional Opuntia oricola chaparral pricklypear Opuntia phaeacantha tulip pricklypear Occasional Occasional Opuntia polyacantha grizzlybear pricklypear Opuntia polyacantha hairspine pricklypear Occasional Opuntia polyacantha plains pricklypear Occasional (beaver-tail, cholla, pencil cactus, prickly Occasional Opuntia spp. pear, rabbit-ears, tuna) Opuntia tomentosa Occasional woollyjoint pricklypear Oxalis woodsorrel Occasional Oxalis albicans California woodsorrel Occasional Oxalis albicans radishroot woodsorrel Occasional Oxalis bowiei red-flower woodsorrel Occasional Oxalis corniculata Occasional creeping woodsorrel Oxalis hirta tropical woodsorrel Occasional Oxalis incarnata crimson woodsorrel Occasional broadleaf woodsorrel Oxalis latifolia Occasional Oxalis oregana redwood-sorrel Occasional Occasional Oxalis pes-caprae Bermuda buttercup purple woodsorrel Occasional Oxalis purpurea Oxalis radicosa dwarf woodsorrel Occasional

Oxalis rubra Occasional windowbox woodsorrel Oxalis spp. (lady's sorrel, redwood sorrel, wood sorrel) Occasional Oxalis suksdorfii Suksdorf woodsorrel Occasional Oxalis trilliifolia threeleaf woodsorrel Occasional Paeonia peony Occasional Paeonia brownii Brown's peony Occasional Paeonia californica California peony Occasional Occasional Paeonia spp. Pandorea jasminoides Jasmine Occasional Parahebe spp. Parkinsonia paloverde Parkinsonia aculeata Jerusalem thorn Parkinsonia florida blue paloverde Parkinsonia microphylla yellow paloverde (Jerusalem thorn, Mexican palo verde) Parkinsonia spp. Very Common **Parthenocissus** creeper Parthenocissus spp. (woodbine, Virginia creeper) Very Common Parthenocissus vitacea woodbine Very Common Passiflora Common passionflower Passiflora caerulea Common bluecrown passionflower Passiflora manicata red passionflower Common Passiflora spp. Passion Vine Common Passiflora tripartita banana passionflower Common Passiflora tripartita banana poka Common Occasional Pastinaca parsnip Pastinaca sativa wild parsnip Occasional Pastinaca spp. (parsnip) Occasional Pelargonium geranium Occasional Pelargonium xdomesticum regal pelargonium Occasional Pelargonium xhortorum zonal geranium Occasional Pelargonium capitatum rose scented geranium Occasional Occasional Pelargonium grossularioides gooseberry geranium Pelargonium inodorum scentless geranium Occasional Occasional Pelargonium inquinans scarlet geranium Pelargonium panduriforme oakleaf garden geranium Occasional Pelargonium peltatum ivyleaf geranium Occasional oakleaf geranium Occasional Pelargonium quercifolium Pelargonium spp. Geranium Occasional Pelargonium vitifolium grapeleaf geranium Occasional Pelargonium zonale horseshoe geranium Occasional Penstemon beardtongue Occasional Penstemon xdubius Occasional

Penstemon xparishii Occasional Occasional Penstemon xpeirsonii Penstemon albomarginatus whitemargin beardtongue Occasional Penstemon anguineus Siskiyou beardtongue Occasional Penstemon azureus azure penstemon Occasional Penstemon barbatus Penstemen Occasional Penstemon barnebyi White River Valley beardtongue Occasional Penstemon bicolor Occasional pinto beardtongue Penstemon bicolor pinto beardtongue Occasional

Occasional Penstemon bryantiae Bryant's beardtongue Penstemon caesius San Bernardino beardtongue Occasional Penstemon calcareus limestone beardtongue Occasional Penstemon californicus California penstemon Occasional Penstemon centranthifolius scarlet bugler Occasional Penstemon cinicola ash penstemon Occasional Cleveland's beardtongue Occasional Penstemon clevelandii Penstemon clevelandii San Jacinto beardtongue Occasional Penstemon davidsonii Occasional Davidson's penstemon Penstemon deustus scabland penstemon Occasional Penstemon eatonii Occasional firecracker penstemon Penstemon filiformis threadleaf beardtongue Occasional Penstemon floridus Austin's beardtongue Occasional Penstemon floridus Panamint beardtongue Occasional Penstemon fruticiformis Death Valley beardtongue Occasional Penstemon gracilentus slender penstemon Occasional Penstemon arinnellii Grinnell's beardtongue Occasional Penstemon heterodoxus Shasta beardtongue Occasional Penstemon heterodoxus Sierra beardtongue Occasional Penstemon heterophyllus bunchleaf penstemon Occasional Penstemon heterophyllus foothill beardtongue Occasional Penstemon heterophyllus Purdy's penstemon Occasional Penstemon humilis low beardtonque Occasional Penstemon incertus Mojave beardtongue Occasional Penstemon janishiae Antelope Valley beardtongue Occasional Penstemon labrosus San Gabriel beardtongue Occasional Penstemon laetus mountain blue penstemon Occasional Penstemon monoensis Mono penstemon Occasional Penstemon neotericus Plumas County beardtongue Occasional Penstemon newberryi Berry's penstemon Occasional Penstemon newberryi mountain pride Occasional Occasional Penstemon newberryi Sonoma penstemon Penstemon pahutensis Paiute beardtongue Occasional Penstemon palmeri Palmer's penstemon Occasional Penstemon papillatus Inyo beardtongue Occasional Penstemon patens Lone Pine beardtongue Occasional Occasional Penstemon personatus closethroat beardtongue Penstemon procerus littleflower penstemon Occasional Penstemon procerus pincushion beardtongue Occasional Penstemon pseudospectabilis desert beardtongue Occasional Penstemon pseudospectabilis desert penstemon Occasional Snow Mountain beardtongue Occasional Penstemon purpusii Penstemon rattanii Rattan's beardtongue Occasional Occasional Penstemon rattanii Santa Cruz Mountains beardtongue Penstemon roezlii Roezl's penstemon Occasional Penstemon rostriflorus Bridge penstemon Occasional Penstemon rupicola cliff beardtongue Occasional Penstemon rydbergii herbaceous penstemon Occasional Penstemon rydbergii Occasional Rydberg's penstemon Occasional Penstemon scapoides pinyon beardtongue Penstemon speciosus royal penstemon Occasional

Penstemon spectabilis	showy penstemon	Occasional
Penstemon spp.	Penstemen	Occasional
Penstemon stephensii	Stephens' penstemon	Occasional
Penstemon strictus	Rocky Mountain penstemon	Occasional
Penstemon subglaber	smooth penstemon	Occasional
Penstemon sudans	Susanville beardtongue	Occasional
Penstemon thompsoniae	Thompson's beardtongue	Occasional
Penstemon thurberi	Thurber's penstemon	Occasional
Penstemon tracyi	Trinity penstemon	Occasional
Penstemon utahensis	Utah penstemon	Occasional
Penstemon venustus	Venus penstemon	Occasional
Perovskia atriplicifolia	Russian Sage	Occasional
Persea spp.	(avocado, Florida mahogany, red bay)	Primary
Persoonia spp.	(bonewood, lance-leaf)	Occasional
Petroselinum	parsley	Occasional
Petroselinum crispum	parsley	Occasional
Petroselinum spp.	(parsley)	Occasional
Phaseolus	bean	Common
Phaseolus filiformis	slimjim bean	Common
Phaseolus spp.	(green bean, kidney bean, lima bean, snap	Common
Thatoaid opp.	bean, stringbean)	Common
Philadelphus	mock orange	Occasional
Philadelphus xinsignis	summer mock orange	Occasional
Philadelphus argenteus	silver mock orange	Occasional
Philadelphus californicus	California mock orange	Occasional
Philadelphus confusus	Piper's mock orange	Occasional
Philadelphus cordifolius	heartleaf mock orange	Occasional
Philadelphus lewisii	Lewis' mock orange	Occasional
Philadelphus microphyllus	littleleaf mock orange	Occasional
Philadelphus oreganus	Oregon mock orange	Occasional
Philadelphus pumilus	dwarf mock orange	Occasional
Philadelphus serpyllifolius	thymeleaf mock orange	Occasional
Philadelphus spp.		Occasional
Philadelphus trichothecus	Columbian mock orange	Occasional
Phlox	phlox	Occasional
Phlox adsurgens	northern phlox	Occasional
Phlox austromontana	mountain phlox	Occasional
Phlox austromontana	prostrate mountain phlox	Occasional
Phlox caespitosa	tufted phlox	Occasional
Phlox condensata		Occasional
Phlox covillei	Coville's phlox	Occasional
Phlox diffusa	spreading phlox	Occasional
Phlox dispersa	High Sierra phlox	Occasional
Phlox dolichantha	Big Bear Valley phlox	Occasional
Phlox douglasii		Occasional
Phlox grayi	×	Occasional
Phlox hirsuta	Yreka phlox	Occasional
Phlox hoodii	carpet phlox	Occasional
Phlox hoodii	musk phlox	Occasional
Phlox hoodii	spiny phlox	Occasional
Phlox longifolia	longleaf phlox	Occasional

Phlox muscoides		Occasional
Phlox pulvinata	cushion phlox	Occasional
Phlox rigida	stiff phlox	Occasional
Phlox speciosa	showy phlox	Occasional
Phlox spp.	(phlox, sweet William)	Occasional
Phlox stansburyi	cold-desert phlox	Occasional
Phlox superba	Sold desert prillex	Occasional
Phlox viridis	green phlox	Occasional
Phormium spp.	green prilox	Occasional
Photinia	chokeberry	Very Common
Photinia davidiana	Chinese photinia	Very Common
Photinia spp.	(photinia)	Very Common
Phyllanthus spp.	(emblic, foliage flower, Otaheite gooseberry)	Occasional
Physalis	groundcherry	Occasional
Physalis acutifolia	sharpleaf groundcherry	Occasional
Physalis angulata	cutleaf groundcherry	Occasional
Physalis cinerascens	smallflower groundcherry	Occasional
Physalis cordata	heartleaf groundcherry	Occasional
Physalis crassifolia	yellow nightshade groundcherry	Occasional
Physalis grisea	strawberry-tomato	Occasional
Physalis hederifolia	Fendler's groundcherry	Occasional
Physalis hederifolia	ivyleaf groundcherry	Occasional
Physalis hederifolia	Palmer's groundcherry	Occasional
Physalis Iongifolia	longleaf groundcherry	Occasional
Physalis mollis	field groundcherry	Occasional
Physalis peruviana	Peruvian groundcherry	Occasional
Physalis philadelphica	-	Occasional
	Mexican groundcherry husk tomato	Occasional
Physalis pubescens Physalis pubescens	husk tomato	Occasional
Physalis spp.		Occasional
Picea	(ground cherry, husk tomato, tomatillo) spruce	Common
Picea breweriana	•	Common
Picea engelmannii	Brewer spruce Engelmann spruce	Common
Picea engelmannii	Engelmann spruce	Common
Picea sitchensis	Sitka spruce	Common
		Common
Picea spp. Pieris spp.	(spruce) (andromeda, fetterbrush, Japanese pieris,lily-of-	Common
<i>Γιστι</i> δ δμφ.	the-valley bush)	Common
Pinus	pine	Common
Pinus ×attenuradiata		Common
Pinus albicaulis	whitebark pine	Common
Pinus attenuata	knobcone pine	Common
Pinus balfouriana	foxtail pine	Common
Pinus contorta	beach pine	Common
Pinus contorta	Bolander beach pine	Common
Pinus contorta	lodgepole pine	Common
Pinus contorta	Sierra lodgepole pine	Common
Pinus coulteri	Coulter pine	Common
Pinus edulis	twoneedle pinyon	Common
Pinus flexilis	limber pine	Common
Pinus halepensis	aleppo pine	Common

Pinus jeffreyi Jeffrey pine Common Pinus lambertiana sugar pine Common Pinus longaeva Great Basin bristlecone pine Common Pinus monophylla California pine Common Pinus monophylla singleleaf pinyon Common Pinus monophylla singleleaf pinyon Common Pinus monticola western white pine Common Pinus muricata Bishop pine Common Italian stone pine Common Pinus pinea Pinus ponderosa ponderosa pine Common Pinus ponderosa ponderosa pine Common Pinus quadrifolia Parry pinyon Common Pinus radiata Monterey pine Common Pinus sabiniana California foothill pine Common Pinus spp. Common (pines) Pinus torreyana Santa Cruz Island Torrey pine Common Pinus torrevana Torrey pine Common Pinus washoensis Washoe pine Common

Pipturus spp. (mamaki)

PisumpeaVery CommonPisum sativumgarden peaVery CommonPisum spp.(garden pea, English pea, snow pea, sugar pea)Very Common

Pittosporum cheesewood

Pittosporum crassifolium stiffleaf cheesewood

Pittosporum spp. Pittosporum tenuifolium tawhiwhi

Plumbago

Pittosporum tobiraJapanese cheesewoodPittosporum undulatumAustralian cheesewood

Plantago plantain Common Plantago aristata largebracted plantain Common Plantago bigelovii coast plantain Common Common Plantago coronopus buckhorn plantain Plantago elongata prairie plantain Common Common Plantago elongata prairie plantain Plantago erecta dotseed plantain Common Plantago eriopoda redwool plantain Common Common Plantago firma Chilean plantain Plantago lanceolata narrowleaf plantain Common Plantago major common plantain Common California goose tongue Plantago maritima Common Plantago maritima goose tongue Common desert Indianwheat Common Plantago ovata Plantago patagonica woolly plantain Common Common Plantago psyllium sand plantain Plantago pusilla dwarf plantain Common Plantago rhodosperma redseed plantain Common Plantago spp. (plantain) Common tall coastal plantain Common Plantago subnuda Plantago virginica Virginia plantain Common (native parsnip) Occasional Platysace spp.

leadwort

Occasional

Plumbago auriculata Occasional Cape leadwort Plumbago spp. (leadwort, plumbago) Occasional Podranea spp. Polygala Occasional polygala Polygala acanthoclada desert polygala Occasional Polygala californica California milkwort Occasional Sierra milkwort Occasional Polygala cornuta Polygala heterorhyncha beaked spiny polygala Occasional Intermountain milkwort Occasional Polygala intermontana Polygala myrtifolia myrtle-leaf milkwort Occasional (milkworts) Occasional Polygala spp. Polygala subspinosa spiny milkwort Occasional knotweed Common Polygonum longroot smartweed Common Polygonum amphibium water knotweed Common Polygonum amphibium Polygonum amphibium water smartweed Common Polygonum arenastrum oval-leaf knotweed Common Polygonum argyrocoleon silversheath knotweed Common Polygonum baldschuanicum Bukhara fleeceflower Common Polygonum bellardii narrowleaf knotweed Common Polygonum bidwelliae Bidwell's knotweed Common Polygonum bistortoides American bistort Common Polygonum bolanderi Bolander's knotweed Common Polygonum californicum California knotweed Common Polygonum capitatum pinkhead smartweed Common black bindweed Common Polygonum convolvulus Polygonum cuspidatum Japanese knotweed Common Polygonum davisiae Davis' knotweed Common Polygonum douglasii Austin knotweed Common Polygonum douglasii Douglas' knotweed Common Polygonum douglasii Douglas' knotweed Common Common Polygonum douglasii Johnston's knotweed Polygonum douglasii large knotweed Common Polygonum douglasii scatter knotweed Common Polygonum erectum erect knotweed Common Polygonum fowleri Fowler's knotweed Common Common Polygonum hickmanii Hickman's knotweed Polygonum hydropiper marshpepper knotweed Common Polygonum hydropiperoides swamp smartweed Common Polygonum lapathifolium curlytop knotweed Common Polygonum marinense Marin knotweed Common broadleaf knotweed Common Polygonum minimum Polygonum multiflorum tuber fleeceflower Common Common Polygonum orientale kiss me over the garden gate Polygonum paronychia beach knotweed Common Polygonum parryi Parry's knotweed Common Polygonum patulum Bellard's smartweed Common Polygonum pensylvanicum Pennsylvania smartweed Common spotted ladysthumb Common Polygonum persicaria poke knotweed Common Polygonum phytolaccifolium Polygonum polygaloides fruitleaf knotweed Common

Kellogg's knotweed Common Polygonum polygaloides Polygonum polygaloides milkwort knotweed Common Polygonum polygaloides whitemargin knotweed Common Polygonum polystachyum cultivated knotweed Common Polygonum punctatum dotted smartweed Common Polygonum ramosissimum bushy knotweed Common Common Polygonum ramosissimum bushy knotweed giant knotweed Common Polygonum sachalinense Shasta knotweed Common Polygonum shastense Polygonum spp. (fleece flower, knotweed, smartweed) Common **Populus** cottonwood Occasional Populus xcanadensis Carolina poplar Occasional Occasional Populus xinopina Occasional Populus xparryi Populus alba white poplar Occasional narrowleaf cottonwood Populus angustifolia Occasional Populus balsamifera balsam poplar Occasional Populus balsamifera black cottonwood Occasional Occasional Populus deltoides Fremont cottonwood Occasional Populus fremontii Populus nigra Lombardy poplar Occasional Occasional Populus spp. (cottonwood, poplar) Populus tremuloides quaking aspen Occasional Primula primrose Occasional Primula spp. Occasional (cowslip, primrose, primula) Primula suffrutescens Occasional Sierra primrose Protea spp. Protea Prunus mula Very Common Prunus akebono Flowering Cherry Very Common Prunus andersonii desert peach Very Common Prunus angustifolia Chickasaw plum Very Common Prunus angustifolia Chickasaw plum Very Common Prunus armeniaca apricot Very Common Prunus avium Very Common Cherry Prunus avium Cherry Very Common Prunus caroliniana Carolina Laurel Cherry Very Common Prunus caroliniana Carolina Laurel Cherry Very Common Prunus cerasifera Very Common Prunus domestica Plum Very Common Prunus domestica Plum Very Common Prunus dulcis sweet almond Very Common Prunus emarginata bitter cherry Very Common Prunus fasciculata desert almond Very Common Prunus fremontii desert apricot Very Common Prunus ilicifolia hollyleaf cherry Very Common Prunus laurel Laurel Very Common Prunus laurocerasus cherry laurel Very Common Prunus Iusitanica Portugal laurel Very Common Prunus Iyonii Catalina Cherry Very Common Prunus mahaleb Mahaleb cherry Very Common Prunus persica peach Very Common

Prunus serrulata		Very Common
Prunus spp.		Very Common
Prunus spp.	Japanese Weeping Cherry	Very Common
Prunus spp.	Double Weeping Rosebud Cherry	Very Common
Prunus <u>spp</u> .	Pluot	Very Common
Prunus subcordata	Kellogg's Klamath plum	Very Common
Prunus subcordata	Klamath plum	Very Common
Prunus subcordata	Oregon Klamath plum	Very Common
Prunus virginiana	black chokecherry	Very Common
Prunus virginiana	chokecherry	Very Common
Prunus virginiana	western chokecherry	Very Common
Pseudopanax spp.	(five-finger, lancewood)	
Pseudotsuga	Douglas-fir	Common
Pseudotsuga macrocarpa	bigcone Douglas-fir	Common
Pseudotsuga menziesii	Douglas-fir	Common
Pseudotsuga menziesii	Douglas-fir	Common
Pseudotsuga spp.	(big-cone pine, Douglas-fir, Japanese Douglas-fir)	Common
Pseudowintera spp.	(Horpito)	Occasional
Psidium cattleianum	Strawberry Guava	
Pteridium	brackenfern	Common
Pteridium aquilinum	hairy brackenfern	Common
Pteridium aquilinum	western brackenfern	Common
Pteridium spp.	(brackenfern)	Common
Pteris	brake fern	Occasional
Pteris cretica	Cretan brake	Occasional
Pteris felix		Occasional
Pteris multifida	spider brake	Occasional
Pteris spp.	(brake, dish fern, table fern)	Occasional
Pteris tremula	Australian brake	Occasional
Pteris vittata	ladder brake	Occasional
Pulicaria	false fleabane	
Pulicaria paludosa	Spanish false fleabane	
Pulicaria spp.	(false fleabane)	
Pyracantha	firethorn	Very Common
Pyracantha angustifolia	narrowleaf firethorn	Very Common
Pyracantha coccinea	scarlet firethorn	Very Common
Pyracantha crenulata	Nepalese firethorn	Very Common
Pyracantha fortuneana	Chinese firethorn	Very Common
Pyracantha spp.	(fire thorn, pyracantha)	Very Common
Pyrus	pear	Very Common
Pyrus communis	common pear	Very Common
Pyrus spp.	Asian Pear	Very Common
Pyrus spp.	Pear	Very Common
Quercus	oak	Occasional
Quercus ×acutidens		Occasional
Quercus ×alvordiana	Alvord oak	Occasional
Quercus ×eplingii		Occasional
Quercus ×ganderi		Occasional
Quercus xgrandidentata		Occasional
Quercus ×howellii		Occasional

Quercus xiolonensis Occasional Quercus xmacdonaldii MacDonald oak Occasional Quercus xmoreha oracle oak Occasional Quercus xmunzii Occasional Quercus xsubconvexa Occasional Quercus xtownei Occasional Quercus agrifolia California live oak Occasional Quercus agrifolia coastal live oak Occasional Quercus berberidifolia scrub oak Occasional Quercus cedrosensis Cedros Island oak Occasional Quercus chrysolepis canyon live oak Occasional Quercus cornelius-mulleri Muller oak Occasional Occasional Quercus douglasii blue oak Quercus dumosa coastal sage scrub oak Occasional Quercus durata leather oak Occasional Quercus engelmannii Engelmann oak Occasional Quercus garryana Oregon white oak Occasional Quercus ilex holly oak Occasional Tucker oak Occasional Quercus john-tuckeri California black oak Occasional Quercus kelloggii Quercus lobata valley oak Occasional Channel Island scrub oak Occasional Quercus pacifica Quercus palmeri Palmer oak Occasional Quercus parvula coast oak Occasional Santa Cruz Island oak Occasional Quercus parvula Quercus parvula Shreve oak Occasional Quercus parvula Tamalpais oak Occasional Quercus sadleriana deer oak Occasional Quercus spp. (oak) Occasional Quercus tomentella island live oak Occasional Quercus turbinella Sonoran scrub oak Occasional Quercus vacciniifolia Occasional huckleberry oak Quercus wislizeni interior live oak Occasional Racosperma spp. (wattle) Very Common Ranunculus buttercup Common Ranunculus acris showy buttercup Common Ranunculus acris Common tall buttercup Ranunculus alismifolius plantainleaf buttercup Common Ranunculus andersonii Anderson's buttercup Common Ranunculus aquatilis white water crowfoot Common Ranunculus arvensis corn buttercup Common Ranunculus bonariensis Carter's buttercup Common Ranunculus bulbosus St. Anthony's turnip Common Ranunculus californicus Common California buttercup Ranunculus canus Sacramento Valley buttercup Common Ranunculus cortusifolius Azores buttercup Common Ranunculus cymbalaria alkali buttercup Common Ranunculus eschscholtzii Common Eschscholtz's buttercup Ranunculus flabellaris Common yellow water buttercup Ranunculus flammula Common greater creeping spearwort Ranunculus flammula greater creeping spearwort Common

Ranunculus glaberrimus Common elliptical buttercup Ranunculus glaberrimus sagebrush buttercup Common Ranunculus gormanii Gorman's buttercup Common Ranunculus hebecarpus delicate buttercup Common Ranunculus hydrocharoides frogbit buttercup Common Ranunculus Iobbii Lobb's buttercup Common Common Ranunculus longirostris longbeak buttercup Ranunculus macounii Common Macoun's buttercup Ranunculus muricatus Common spinyfruit buttercup Ranunculus occidentalis western buttercup Common Bloomer's buttercup Ranunculus orthorhynchus Common Ranunculus orthorhynchus straightbeak buttercup Common Ranunculus parviflorus smallflower buttercup Common Ranunculus populago popular buttercup Common Ranunculus pusillus Common low spearwort Ranunculus pusillus low spearwort Common Ranunculus repens creeping buttercup Common Ranunculus sardous hairy buttercup Common Ranunculus sceleratus cursed buttercup Common Ranunculus sceleratus Common cursed buttercup Ranunculus spp. (buttercups, crowfoot) Common Ranunculus suksdorfii Suksdorf's buttercup Common Ranunculus trichophyllus threadleaf crowfoot Common Ranunculus trichophyllus threadleaf crowfoot Common Ranunculus uncinatus Idaho buttercup Common Ranunculus uncinatus woodland buttercup Common Ranunculus verecundus wetslope buttercup Common Raphanus radish Occasional Raphanus raphanistrum wild radish Occasional Raphanus sativus cultivated radish Occasional Raphanus spp. (wild radish) Occasional Reseda Occasional mignonette Reseda alba white upright mignonette Occasional Reseda lutea Occasional yellow mignonette Reseda luteola Occasional Reseda odorata garden mignonette Occasional Reseda spp. Occasional (mignonette) Rhamnus buckthorn Rhamnus alnifolia alderleaf buckthorn Rhamnus alternus Itialian Buchthorn Rhamnus cathartica common buckthorn Rhamnus crocea hollyleaf buckthorn Rhamnus crocea redberry buckthorn Rhamnus ilicifolia hollyleaf redberry Rhamnus pirifolia island redberry Rhamnus spp. Rhamnus Rhaphiolepis spp. (Japanese-hawthorn Very Common Rhododendron rhododendron Common Common Rhododendron xcolumbianum Pacific rhododendron Common Rhododendron macrophyllum Common Rhododendron neoglandulosum

Rhododendron occidentale Sonoma azalea Common Rhododendron occidentale western azalea Common Rhododendron spp. (azalea, rhododendron) Common Ribes currant Very Common Ribes amarum bitter gooseberry Very Common Ribes aureum golden currant Very Common Ribes binominatum ground gooseberry Very Common Ribes bracteosum stink currant Very Common Ribes californicum hillside gooseberry Very Common Ribes canthariforme Moreno currant Very Common Ribes cereum wax currant Very Common Ribes cereum whisky currant Very Common Ribes cruentum shinyleaf currant Very Common Ribes divaricatum Parish's gooseberry Very Common Ribes divaricatum spreading gooseberry Very Common Ribes divaricatum straggly gooseberry Very Common Ribes hudsonianum northern black currant Very Common Ribes hudsonianum western black currant Very Common Ribes indecorum Very Common whiteflower currant Ribes inerme Klamath gooseberry Very Common Ribes inerme whitestem gooseberry Very Common Ribes lacustre prickly currant Very Common Ribes lasianthum alpine gooseberry Very Common Ribes laxiflorum trailing black currant Very Common Ribes lobbii gummy gooseberry Very Common Ribes malvaceum chaparral currant Very Common Ribes marshallii Hupa gooseberry Very Common Ribes menziesii canyon gooseberry Very Common Ribes montigenum gooseberry currant Very Common Ribes nevadense Jaeger's currant Very Common Ribes nevadense Sierra currant Very Common Ribes quercetorum rock gooseberry Very Common Ribes roezlii Sierra gooseberry Very Common Very Common Ribes sanguineum Ribes sanguineum Very Common Ribes sericeum Lucia gooseberry Very Common Ribes speciosum Very Common fuchsiaflower gooseberry Ribes spp. Very Common Ribes thacherianum Santa Cruz gooseberry Very Common Ribes tularense Tulare gooseberry Very Common Ribes velutinum desert gooseberry Very Common Ribes velutinum Gooding's gooseberry Very Common Ribes viburnifolium island gooseberry Very Common Ribes victoris Victor's gooseberry Very Common Ribes viscosissimum sticky currant Very Common Ripogonum spp. (supplejack) Occasional Robinia locust Robinia hispida bristly locust New Mexico locust Robinia neomexicana Robinia pseudoacacia black locust

(locust)

Robinia spp.

Rosa Very Common rose Rosa ?pinetorum pine rose Very Common Rosa bridgesii pygmy rose Very Common Rosa californica California wildrose Very Common Rosa canina doa rose Very Common Rosa eglanteria sweetbriar rose Very Common dwarf rose Very Common Rosa gymnocarpa Rosa minutifolia Baja rose Very Common Rosa multiflora multiflora rose Very Common Rosa nutkana Nootka rose Very Common Rosa pisocarpa cluster rose Very Common Rosa sicula Mediterranean rose Very Common Rosa spithamea ground rose Very Common Rosa spithamea Sonoma ground rose Very Common Rosa spp. Very Common Rose Rosa woodsii Tehachapi rose Very Common Rosa woodsii Woods' rose Very Common Rosa yainacensis Cascade rose Very Common Rubus blackberry Primary Rubus aboriginum garden dewberry Primary Rubus allegheniensis Allegheny blackberry Primary Rubus armeniacus Himalayan blackberry Primary Rubus alaucifolius Cuyamaca raspberry Primary Rubus glaucifolius San Diego raspberry Primary Rubus idaeus American red raspberry Primary Rubus idaeus grayleaf red raspberry Primary Rubus laciniatus cutleaf blackberry Primary Rubus lasiococcus roughfruit berry Primary Rubus leucodermis whitebark raspberry Primary Rubus nivalis snow raspberry Primary Rubus parviflorus thimbleberry Primary Rubus spectabilis salmonberry Primary Rubus spp. (blackberry, boysenberry, raspberry) Primary Rubus ulmifolius elmleaf blackberry Primary Rubus ursinus California blackberry Primary Rubus vitifolius Pacific dewberry Primary Rudbeckia coneflower Rudbeckia californica California coneflower Rudbeckia glaucescens waxy coneflower Rudbeckia hirta blackeyed Susan Rudbeckia klamathensis Klamath coneflower western coneflower Rudbeckia occidentalis Rumex dock Common Rumex xacutus Common Rumex acetosella common sheep sorrel Common Rumex aquaticus western dock Common Rumex conglomeratus clustered dock Common Rumex crispus curly dock Common Rumex dentatus toothed dock Common Rumex frutescens wedgeleaf dock Common Common Rumex hymenosepalus canaigre dock

Rumex kerneri Kerner's dock Common Rumex maritimus golden dock Common Rumex obtusifolius bitter dock Common Rumex occidentalis Common Rumex orbiculatus greater water dock Common Rumex paucifolius alpine sheep sorrel Common fiddle dock Rumex pulcher Common Rumex salicifolius lake willow dock Common Rumex salicifolius Mexican dock Common Rumex salicifolius toothed willow dock Common Rumex salicifolius willow dock Common Rumex sanguineus redvein dock Common (common sheep sorrel, dock, garden sorrel) Common Rumex spp. narrowleaf dock Common Rumex stenophyllus Rumex venosus veiny dock Common Rumex violascens violet dock Common Salix willow Occasional Salix xehrhartiana Occasional Salix xpendulina Wisconsin weeping willow Occasional Salix xrubens hybrid crack willow Occasional Salix xsepulcralis weeping willow Occasional Salix alba white willow Occasional Salix arctica Occasional Salix bebbiana Bebb willow Occasional Booth's willow Occasional Salix boothii shortfruit willow Salix brachycarpa Occasional Salix breweri Brewer's willow Occasional Salix delnortensis Del Norte willow Occasional Salix drummondiana Drummond's willow Occasional Salix eastwoodiae mountain willow Occasional Salix eriocephala Occasional narrowleaf willow Occasional Salix exigua Salix geyeriana Geyer willow Occasional Occasional Salix gooddingii Goodding's willow Salix hookeriana dune willow Occasional Salix jepsonii Jepson's willow Occasional Occasional Salix laevigata red willow Salix lasiolepis arroyo willow Occasional Salix lasiolepis Bigelow's willow Occasional Salix lemmonii Lemmon's willow Occasional Salix ligulifolia strapleaf willow Occasional Salix lucida greenleaf willow Occasional Salix lucida Pacific willow Occasional Salix lucida Occasional shining willow Salix lutea yellow willow Occasional Salix melanopsis dusky willow Occasional Salix nivalis snow willow Occasional Salix orestera Sierra willow Occasional Occasional Salix petrophila alpine willow diamondleaf willow Occasional Salix planifolia diamondleaf willow Occasional Salix planifolia

Salix prolixa	MacKenzie's willow	Occasional
Salix reticulata		Occasional
Salix scouleriana	Scouler's willow	Occasional
Salix sessilifolia	northwest sandbar willow	Occasional
Salix sitchensis	Sitka willow	Occasional
Salix spp.	Willow	Occasional
Salix tracyi	Tracy's willow	Occasional
Salvia	sage	Occasional
Salvia ×bernardina	dago	Occasional
Salvia ×palmeri		Occasional
Salvia aethiopis	Mediterranean sage	Occasional
Salvia apiana	compact white sage	Occasional
Salvia apiana	white sage	Occasional
Salvia brandegeei	Santa Rosa Island sage	Occasional
Salvia carduacea	thistle sage	Occasional
Salvia clevelandii	inolo oago	Occasional
Salvia columbariae	chia	Occasional
Salvia columbariae	Ziegler's sage	Occasional
Salvia dorrii	purple sage	Occasional
Salvia eremostachya	rose sage	Occasional
Salvia funerea	woolly sage	Occasional
Salvia greatae	lavender sage	Occasional
Salvia leucophylla	San Luis purple sage	Occasional
Salvia longistyla	Mexican sage	Occasional
Salvia mellifera	black sage	Occasional
Salvia microphylla	baby sage	Occasional
Salvia mohavensis	Mojave sage	Occasional
Salvia munzii	Munz's sage	Occasional
Salvia officinalis	kitchen sage	Occasional
Salvia pachyphylla	blue sage	Occasional
Salvia reflexa	lanceleaf sage	Occasional
Salvia sonomensis	creeping sage	Occasional
Salvia spathacea	hummingbird sage	Occasional
Salvia spp.	Sage	Occasional
Salvia vaseyi	scallopleaf sage	Occasional
Salvia verbenaca	wild clary	Occasional
Salvia virgata	wand sage	Occasional
Sambucus	elderberry	Occasional
Sambucus cerulea	,	Occasional
Sambucus nigra	blue elder	Occasional
Sambucus nigra	common elderberry	Occasional
Sambucus nigra	European black elderberry	Occasional
Sambucus racemosa	black elderberry	Occasional
Sambucus racemosa	red elderberry	Occasional
Sambucus spp.	(elderberry)	Occasional
Santalum spp.	(sandalwood)	
Schlumbergera spp.	Zygocatus spp. (Christmas cactus, claw cactus,	
- 11	crab cactus)	
Senecio	ragwort	Common
Senecio aphanactis	chaparral ragwort	Common
Senecio aronicoides	rayless ragwort	Common

Senecio astephanus San Gabriel ragwort Common Senecio blochmaniae dune ragwort Common Senecio californicus California ragwort Common Senecio cineraria silver ragwort Common Senecio clarkianus Clark's ragwort Common Senecio elegans redpurple ragwort Common Senecio flaccidus Common Douglas' ragwort Senecio flaccidus Mono ragwort Common Senecio flaccidus threadleaf ragwort Common Senecio fremontii dwarf mountain ragwort Common Senecio hydrophiloides tall groundsel Common Senecio hydrophilus water ragwort Common Senecio integerrimus Columbia ragwort Common Senecio integerrimus lambstongue ragwort Common Common Senecio integerrimus paleyellow ragwort Senecio jacobaea stinking willie Common Senecio Ivonii island senecio Common Senecio mohavensis Mojave ragwort Common Senecio pattersonensis Patterson's senecio Common Senecio scorzonella Sierra ragwort Common Senecio serra tall ragwort Common Senecio spartioides broomlike ragwort Common Senecio spp. (dusty-miller, groundsels) Common Senecio squalidus oxford ragwort Common Senecio sylvaticus woodland ragwort Common Senecio triangularis arrowleaf ragwort Common Senecio vulgaris old-man-in-the-Spring Common Seguoia redwood Seguoia sempervirens redwood Seguoia spp. (coast redwood) Sida Occasional fanpetals Sida abutifolia Occasional spreading fanpetals Sida rhombifolia Cuban jute Occasional Occasional Sida spinosa prickly fanpetals Sida spp. (fanpetals, Virginia mallow) Occasional Sisymbrium hedgemustard Common tall tumblemustard Common Sisymbrium altissimum Sisymbrium erysimoides Mediterranean rocket Common Sisymbrium irio London rocket Common Sisymbrium loeselii small tumbleweed mustard Common Sisymbrium officinale hedgemustard Common Sisymbrium orientale Indian hedgemustard Common Sisymbrium spp. (hedge mustard) Common Smilax Occasional greenbrier Smilax californica California greenbrier Occasional Smilax jamesii English Peak greenbrier Occasional Smilax spp. (greenbrier, Jacob's ladder, wild sarsaparilla) Occasional Solanum nightshade Occasional Solanum americanum American black nightshade Occasional Solanum aviculare New Zealand nightshade Occasional Solanum cardiophyllum heartleaf horsenettle Occasional

Occasional Solanum carolinense Carolina horsenettle Solanum clokeyi Clokey's nightshade Occasional Solanum dimidiatum western horsenettle Occasional Solanum douglasii greenspot nightshade Occasional Solanum dulcamara climbing nightshade Occasional Solanum elaeagnifolium silverleaf nightshade Occasional Occasional Solanum furcatum forked nightshade Chilean nightshade Occasional Solanum gayanum Solanum heterodoxum melonleaf nightshade Occasional Solanum lanceolatum orangeberry nightshade Occasional Occasional Solanum lycopersicum garden tomato Solanum marginatum purple African nightshade Occasional Solanum mauritianum earleaf nightshade Occasional black nightshade Occasional Solanum nigrum Parish's nightshade Occasional Solanum parishii Solanum peruvianum Peruvian nightshade Occasional Solanum physalifolium hoe nightshade Occasional Solanum rostratum buffalobur nightshade Occasional Solanum scabrum garden-huckleberry Occasional Solanum sisymbriifolium sticky nightshade Occasional Solanum spp. (horse nettles, nightshade, pepino, potato) Occasional Solanum tenuilobatum San Diego nightshade Occasional Solanum triflorum cutleaf nightshade Occasional Solanum tuberosum Irish potato Occasional Solanum umbelliferum bluewitch Occasional Solanum umbelliferum bluewitch nightshade Occasional Solanum villosum hairy nightshade Occasional Solanum wallacei Catalina nightshade Occasional Solanum xanti chaparral nightshade Occasional Solanum xanti Hoffmann's nightshade Occasional Solanum xanti San Luis Obispo nightshade Occasional Common Solidago goldenrod Solidago altissima late goldenrod Common Common Solidago californica California goldenrod Solidago canadensis Canada goldenrod Common Solidago canadensis salebrosa goldenrod Common Common Solidago gigantea giant goldenrod Common Solidago guiradonis Guirado goldenrod Solidago lepida Common Solidago multiradiata manyray goldenrod Common Solidago multiradiata Rocky Mountain goldenrod Common Common Solidago simplex Mt. Albert goldenrod Solidago spathulata Common Common Solidago spectabilis Nevada goldenrod Solidago spp. (California goldenrod, Canada goldenrod, Common goldenrod) Solidago velutina threenerve goldenrod Common Sollya sollya Sollya heterophylla bluebell creeper Sollya spp. (Australian bluebells, bluebell creeper)

sowthistle

Sonchus

Common

Sonchus arvensisfield sowthistleCommonSonchus asperspiny sowthistleCommonSonchus oleraceuscommon sowthistleCommonSonchus spp.(sowthistle)CommonSonchus tenerrimusslender sowthistleCommon

Sophora spp. (sophora)

SpergulaspurryOccasionalSpergula arvensiscorn spurryOccasionalSpergula spp.(corn spurry, spurry)Occasional

Spiraea spirea spirea Spiraea douglasii rose spirea

Spiraea splendens rose meadowsweet

Spiraea spp. Spiraea

Syringa spp. (lilac) Occasional

Teucrium germander

Teucrium canadenseCanada germanderTeucrium canadensewestern germanderTeucrium cubensesmall coastal germanderTeucrium fruticansshrubby germanderTeucrium glandulosumcommon germander

Teucrium spp. Germander

Thujared cedarOccasionalThuja plicatawestern red cedarOccasionalThuja spp.(cedar, giant cedar, Oriental arborvitae, redOccasional

cedar, white cedar)

Tibouchina spp.(glory bush, lasiandra, pleroma, princess flower)OccasionalTibouchina urvilleanaPrincess FlowerOccasionalTithonia spp.(Mexican sunflower)Common

Tolmieayouth on ageTolmiea menziesiiPiggy-back PlantTolmiea menziesiiPiggy-back PlantTrachelospermum jasminoidesStar Jasmine

Trifolium arvense

TradescantiaspiderwortOccasionalTradescantia fluminensissmall-leaf spiderwortOccasionalTradescantia spp.Occasional

Tradescantia virginiana Virginia spiderwort Occasional **Trifolium** clover Very Common Trifolium albopurpureum rancheria clover Very Common Trifolium alexandrinum Egyptian clover Very Common Trifolium amoenum showy Indian clover Very Common Trifolium andersonii Beatley's clover Very Common Trifolium andersonii fiveleaf clover Very Common Trifolium andersonii Mono clover Very Common narrowleaf crimson clover Trifolium angustifolium Very Common

Trifolium aureum golden clover Very Common Very Common Trifolium barbigerum Andrews' clover Trifolium barbigerum bearded clover Very Common Trifolium beckwithii Beckwith's clover Very Common Trifolium bifidum notchleaf clover Very Common Trifolium bolanderi parasol clover Very Common

rabbitfoot clover

Very Common

Trifolium breweri forest clover Very Common Trifolium buckwestiorum Santa Cruz clover Very Common Trifolium campestre field clover Very Common Trifolium cernuum nodding clover Very Common Trifolium ciliolatum foothill clover Very Common Trifolium cyathiferum cup clover Very Common Trifolium dedeckerae Dedecker's clover Very Common Trifolium depauperatum balloon sack clover Very Common Trifolium depauperatum cowbag clover Very Common Trifolium dichotomum branched Indian clover Very Common Trifolium dubium suckling clover Very Common Trifolium eriocephalum Cusick's clover Very Common Trifolium eriocephalum woollyhead clover Very Common Trifolium fragiferum strawberry clover Very Common Trifolium fucatum bull clover Very Common Very Common Trifolium gemellum Spanish clover Trifolium glomeratum clustered clover Very Common Trifolium gracilentum Palmer's clover Very Common Very Common Trifolium gracilentum pinpoint clover Trifolium gymnocarpon hollyleaf clover Very Common Trifolium gymnocarpon Plummer's clover Very Common Very Common Trifolium hirtum rose clover Trifolium howellii canvon clover Very Common Trifolium hybridum alsike clover Very Common crimson clover Very Common Trifolium incarnatum Jim's clover Trifolium jokerstii Very Common Trifolium kingii Very Common Trifolium lemmonii Lemmon's clover Very Common Trifolium longipes Elmer's clover Very Common Trifolium longipes Hansen's clover Very Common Very Common Trifolium longipes longstalk clover Trifolium longipes Very Common Oregon clover Trifolium macilentum Very Common Trifolium macraei Chilean clover Very Common Trifolium macrocephalum largehead clover Very Common Trifolium microcephalum smallhead clover Very Common Trifolium microdon thimble clover Very Common Trifolium minutissimum dwarf clover Very Common Trifolium monanthum mountain carpet clover Very Common Trifolium mucronatum Very Common Trifolium obtusiflorum clammy clover Very Common Trifolium oliganthum fewflower clover Very Common Trifolium olivaceum olive clover Very Common Trifolium polyodon Very Common red clover Trifolium pratense Very Common Trifolium productum Shasta clover Very Common Trifolium repens white clover Very Common Trifolium resupinatum reversed clover Very Common Trifolium retusum teasel clover Very Common Trifolium siskiyouense Siskiyou clover Very Common Trifolium spp. (clover) Very Common

Trifolium stellatum star clover Very Common Trifolium striatum knotted clover Very Common Trifolium subterraneum subterranean clover Very Common Trifolium tomentosum woolly clover Very Common Trifolium trichocalvx Monterey clover Very Common Trifolium variegatum whitetip clover Very Common Trifolium vesiculosum arrowleaf clover Very Common Trifolium willdenovii Very Common Trifolium willdenowii tomcat clover Very Common Trifolium wormskioldii cows clover Very Common Triglochin arrowgrass Occasional Triglochin concinna slender arrowgrass Occasional Triglochin maritima seaside arrowgrass Occasional Occasional Triglochin palustris marsh arrowgrass Triglochin spp. Occasional (arrow grass) Triglochin striata three-rib arrowgrass Occasional Ulex Very Common gorse Ulex europaeus common gorse Very Common Ulex spp. (furze, gorse, whin) Very Common Ulma spp. Umbellularia California laurel Umbellularia californica California Bay Laurel Umbellularia californica California Bay Laurel Urtica nettle Common Urtica dioica Common California nettle Urtica dioica Common stinging nettle Urtica spp. (nettles, stinging nettles) Common Urtica urens dwarf nettle Common Vaccinium blueberry Common Vaccinium caespitosum dwarf bilberry Common Common Vaccinium cespitosum Vaccinium deliciosum Cascade bilberry Common Vaccinium macrocarpon cranberry Common Vaccinium membranaceum thinleaf huckleberry Common Vaccinium ovatum California huckleberry Common Common Vaccinium parvifolium red huckleberry Vaccinium scoparium grouse whortleberry Common Vaccinium spp. (blueberry) Common Vaccinium uliginosum bog blueberry Common Verbena vervain Occasional Verbena xclemensiorum Amador County vervain Occasional Verbena abramsii Occasional San Bernardino vervain Verbena bonariensis purpletop vervain Occasional Verbena bracteata bigbract verbena Occasional Verbena brasiliensis Brazilian vervain Occasional Verbena californica Red Hills vervain Occasional Verbena canescens gray vervain Occasional Verbena hastata swamp verbena Occasional Occasional Verbena lasiostachys western vervain Verbena litoralis seashore vervain Occasional Verbena menthifolia Occasional mint vervain

Verbena neomexicana hillside vervain Occasional Verbena officinalis herb of the cross Occasional Verbena rigida tuberous vervain Occasional Verbena robusta Occasional Verbena scabra sandpaper vervain Occasional Verbena spp. (verbena, vervain) Occasional Veronica Occasional speedwell Occasional Veronica americana American speedwell Veronica anagallis-aquatica Occasional water speedwell Veronica arvensis corn speedwell Occasional Veronica beccabunga Occasional European speedwell Veronica catenata Occasional Veronica chamaedrys germander speedwell Occasional Occasional Veronica copelandii Copeland's speedwell Veronica cusickii Cusick's speedwell Occasional Veronica filiformis threadstalk speedwell Occasional Veronica hederifolia ivyleaf speedwell Occasional Veronica officinalis common gypsyweed Occasional Occasional Veronica peregrina hairy purslane speedwell Occasional Veronica peregrina neckweed Veronica persica birdeye speedwell Occasional Occasional Veronica scutellata skullcap speedwell Veronica serpvllifolia brightblue speedwell Occasional Veronica serpyllifolia thymeleaf speedwell Occasional Occasional Veronica spp. (brooklime, speedwell) Veronica triphyllos finger speedwell Occasional Veronica wormskjoldii American alpine speedwell Occasional Veronica wormskjoldii American alpine speedwell Occasional Viburnum viburnum Occasional Viburnum ellipticum common viburnum Occasional Occasional Viburnum spp. (arrowwoods) Viburnum tinus Viburnum Occasional Viburnum tinus Viburnum Occasional Vicia vetch Primary Vicia ?disperma European vetch Primary Vicia americana American vetch Primary Vicia americana American vetch Primary Vicia articulata oneflower vetch Primary Vicia benghalensis reddish tufted vetch Primary Vicia bithynica Bithynian vetch Primary Vicia cracca bird vetch Primary Vicia faba horsebean Primary Vicia hassei Hasse's vetch Primary Vicia hirsuta tiny vetch Primary Vicia lathyroides spring vetch Primary Vicia Iudoviciana Louisiana vetch Primary Vicia lutea smooth yellow vetch Primary Vicia nigricans black vetch Primary giant vetch Vicia nigricans Primary Vicia pannonica Hungarian vetch Primary Vicia sativa garden vetch Primary

(broad bean, tare, vetch) Vicia spp. Primary Vicia tetrasperma lentil vetch Primary Vicia villosa winter vetch Primary Vinca periwinkle Occasional Vinca maior bigleaf periwinkle Occasional Vinca minor Vinca Occasional Vinca spp. (periwinkles) Occasional Occasional Viola violet Viola adunca hookedspur violet Occasional Viola adunca hookedspur violet Occasional Viola adunca Kirk's violet Occasional Viola arvensis European field pansy Occasional Viola aurea golden violet Occasional Viola bakeri Occasional Baker's violet Viola beckwithii Beckwith's violet Occasional Viola beckwithii western pansy Occasional Viola californica California violet Occasional Viola canadensis Occasional Occasional Viola cuneata wedgeleaf violet Occasional Viola douglasii Douglas' golden violet Viola epipsila dwarf marsh violet Occasional dwarf marsh violet Occasional Viola epipsila Viola alabella pioneer violet Occasional Viola hallii Oregon violet Occasional Viola howellii Occasional Viola lanceolata Occasional bog white violet Viola lanceolata bog white violet Occasional Viola langsdorfii Aleutian violet Occasional Viola lobata pine violet Occasional Viola macloskeyi small white violet Occasional smooth white violet Occasional Viola macloskeyi Occasional Viola nephrophylla northern bog violet Viola ocellata pinto violet Occasional Viola odorata sweet violet Occasional Viola palustris marsh violet Occasional marsh violet Occasional Viola palustris Occasional Viola pedunculata Johnny-jump-up Viola pinetorum goosefoot yellow violet Occasional Viola praemorsa canary violet Occasional Viola praemorsa upland yellow violet Occasional Viola psychodes butterfly violet Occasional goosefoot violet Occasional Viola purpurea Viola sempervirens evergreen violet Occasional Viola sheltonii Shelton's violet Occasional Viola sororia Occasional Viola spp. Occasional Viola tomentosa feltleaf violet Occasional Viola tricolor johnny jumpup Occasional Viola vallicola Occasional sagebrush violet Viola vallicola Occasional valley violet Vitis grape Very Common Vitis aestivalis Very Common summer grape Vitis aestivalis summer grape Very Common Vitis californica California wild grape Very Common Vitis girdiana desert wild grape Very Common Vitis rupestris Very Common sand grape Vitis spp. (grape) Very Common Very Common Vitis vinifera wine grape Occasional Weigela spp. (weigela)

Weinmannia spp. (kamahi)

Wikstroemia spp. (Mou'a, Oahu false Ohelo) Common

Wilkesia spp.

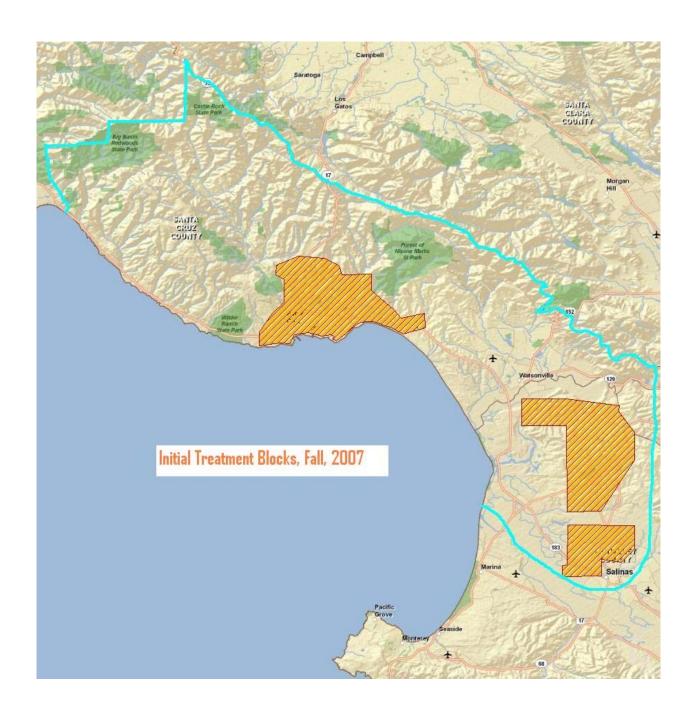
Wisteria spp.(wisteria)Very CommonZeacornOccasionalZea mayscornOccasionalZea spp.(corn, maize)Occasional

Zelkova serrata Zelkova Zelkova spp. (zelkova)

Zygocactus spp. Occasional

Appendix B. Proposed Treatment Area





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Appendix C. Ecological Risk Assessment

Screening Level Ecological Risk Assessment for Acetate Based Straight Chain Lepidopteran Pheromones

Introduction

The purpose of this risk assessment is to quantify the risks of straight chain lepidopteran pheromones to nontarget terrestrial and aquatic organisms. Several groups of lepidopteran pheromones have been identified, but the focus of this assessment is to determine potential ecological risks of acetate-based lepidopteran pheromones. This is the class of pheromones that are the active ingredients in both Checkmate labels that are proposed for use in the light brown apple moth (LBAM) eradication program. Current registration data requirements for straight chain lepidopteran pheromones in the United States, Canada, and Europe are less than conventional insecticides (OECD, 2002; EPA, 2007). The reduced data requirements are based on similarities in toxicity, exposure, and environmental fate that suggest that these types of pheromones pose minimal risk to human health and the environment. Due to these similarities in fate and effects, regulatory agencies have adopted a structure activity relationship approach for straight chain lepidopteran pheromones (Weatherston and Minks, 1995). This assessment summarizes the range of toxicity data for acetate-based straight chain lepidopteran pheromones. It also provides conservative estimates of exposure in terrestrial and aquatic environments so that conservative estimates of risk can be determined and discussed.

Toxicity

Terrestrial

Based on the available acute mammalian toxicity data for approximately 10 different lepidopteran pheromones the median lethal oral dose (LD_{50}) for rats would be considered practically nontoxic, with values ranging from greater then 5 g/kg to greater than 34.6 g/kg. Acute dermal toxicity is also considered low with LD_{50} values ranging from greater than 2 g/kg to 20.25 g/kg, based on study results from nine acetate based straight chain lepidopteran pheromones. Inhalation hazards are also low based on results compiled from three studies that show that the median lethal concentration (LC_{50}) values range from 3.3 to 33.2 mg/L (Touhey, 1990; Inscoe and Ridgway, 1992; Weatherston and Stewart, 2002).

Available subchronic and developmental mammalian toxicity studies have shown no mutagenic or developmental effects for all tested pheromones (Touhey, 1990). Daughtrey et al. (1990) dosed rats daily 5 days per week for 13 weeks with tridecyl acetate at doses ranging from 0.1 to 1.0 g/kg/day. The calculated no observable effect level was found to be 0.1 g/kg/day based on a slight increase in liver weight which is consistent with long-term dosing.

Toxicity to birds is also considered to be very low based on available avian toxicity data. Acute oral LD_{50} values for bobwhite quail are greater than 2 g/kg while mallard values range from greater than 2 g/kg to greater than 10 g/kg (Weatherston, 2002).

Aquatic

Based on the available acute toxicity data for freshwater fish straight chain lepidopteran pheromones would be considered practically nontoxic. Based on results from four bluegill studies and three rainbow trout studies, the range of toxicity values is greater than 100 mg/L to 540 mg/L for the bluegill sunfish, and greater than 100 mg/L to 270 mg/L for the rainbow trout (Weatherston and Minks, 2002). Aquatic invertebrates appear to be more sensitive than fish with EC₅₀ values ranging from 1.30 to 6.80 mg/L for the freshwater cladoceran, *Daphnia magna*. All aquatic toxicity values that have been reported are above the solubility limits for these types of pheromones in water and would not occur in the environment due to their chemical properties.

Exposure

Due to the unique method of application being implemented in this program, currently available drift models, such as AgDrift and AgDisp, have limited use. Proposed application heights are 2well above the 150-foot application height limit that has been validated using these types of models. To determine exposure of nontarget organisms to pheromone applications, residues in terrestrial and aquatic systems were calculated based on the assumption of direct applications to both environments.

Terrestrial

Residues in terrestrial environments were determined using the Environmental Protection Agency's (EPA) Office of Pesticide Program (OPP) Terrestrial Residue Exposure Model (T-REX) (EPA, 2005). T-REX allows the user to input variables such as use, application rate/type, percent active ingredient, foliar dissipation half-life, application interval and number of applications to calculate exposure concentrations on a variety of food items. All estimated environmental concentrations (EEC) in this risk assessment are based on the upper bound residue estimates on different terrestrial food items. Output from the model has been validated based on the review of field residue data (Fletcher et al., 1994). Dose based residues were calculated for different sized mammals and birds so that they could be compared to the most sensitive toxicity value for each group (table 1 and 2). Residues are assumed to result from a direct application to the listed food items.

Table 1. Expected Pheromone Residues For Different Mammalian Classes and Body Weights.

Dose-Based EECs	Mammalian Classes and Body Weight					
(mg/kg-bw*)	Herbivores/insectivores		Granivores			
	15 g	35 g	1000 g	15 g	35 g	1000 g
Short Grass	10.07	6.96	1.61			
Tall Grass	4.61	3.19	0.74			
Broadleaf plants/sm Insects	5.66	3.91	0.91			
Fruits/pods/seeds/lg insects	0.63	0.43	0.10	0.14	0.10	0.02

*bw = body weight

Table 2. Expected Pheromone Residues For Different Avian Classes and Body Weights.

Dose-based EECs	Avian Classes and Body Weights			
(mg/kg-bw)	small	mid	large	
	20 g	100 g	1000 g	
Short Grass	12.03	6.86	3.07	
Tall Grass	5.51	3.14	1.41	
Broadleaf plants/sm Insects	6.77	3.86	1.73	
Fruits/pods/seeds/lg insects	0.75	0.43	0.19	

Aquatic

As a more conservative estimate of exposure, residues in aquatic environments were determined based on the assumption of a direct application. This would not occur in an actual application because it is inconsistent with the label for both products and would be a violation of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). In addition, the pheromone is insoluble in water and would not be able to go into solution resulting in exposure to aquatic fauna. The assumptions in the direct application were that a maximum rate of pheromone (20 g/active ingredient/acre) would be applied directly to a body of water one hectare in size and 0.5 meters deep. The water body was assumed to be a closed system with no inlet or outlet and no degradation of the pheromone. In addition, the pheromone was considered to be 100% soluble in water. Based on these very conservative assumptions, the maximum residue in the defined aquatic system was determined to be 0.01 mg/L.

Risk

The risk to terrestrial and aquatic organisms was quantified by dividing the exposure residue by the most sensitive toxicity value in each environment to determine a risk quotient.

Risk Quotient = Estimated Environmental Concentration / Toxicity Endpoint

EPA OPP uses a similar approach in calculating risk and then compares the risk quotient to levels of concern that have been established to determine a presumption of risk to terrestrial and aquatic nontarget organisms. Levels of concern that have been established for direct acute effects to terrestrial organisms range from 0.1 for endangered species to 0.5, as a trigger, for acute high risk. For aquatic species, the levels of concern range from 0.05 for listed species to 0.5 for aquatic high risk. Risk quotient values that exceed these values result in a presumption of risk and further analysis is needed. Chronic levels of concern are set at one for both terrestrial and aquatic organisms.

Terrestrial

Based on the calculated residues for different mammal classes and the lowest acute toxicity value for mammals ($LD_{50} > 5$ g/kg), all risk quotients were less than 0.009 suggesting minimal risk to nontarget mammals. Using the lowest subchronic toxicity endpoint (NOEL = 0.1 g/kg), chronic risk to different mammal classes was 0.05 and below for all mammal classes and sizes suggesting minimal chronic risk.

Using the residues calculated for different bird classes and sizes, and the lowest reported avian toxicity value ($LD_{50} > 2$ g/kg), all acute risk quotient values were less than 0.01 since the toxicity value was based on a value where no effect was observed at the highest concentration tested.

All calculated risk quotient values for terrestrial nontarget organisms were well below any levels of concern that have been established for terrestrial nontarget organisms by EPA.

Aquatic

The risk to fish was calculated by taking the residue value of 0.01 mg/L and dividing it by the lowest reported LC₅₀, which is reported as greater than 100 mg/L. In this case, the resulting risk quotient value is <0.0001 since the toxicity value is reported as greater than the highest test concentration. Taking the lowest reported D. magna value (EC₅₀ = 1.30 mg/L) and comparing it to the 0.01 mg/L maximum residue results in a risk quotient value of 0.008. These values show that the residues in water are 130 to greater than 10,000 times below any available aquatic effects data, based on overly conservative estimates of exposure. In addition, the calculated risk quotients are an order of magnitude or more below the most sensitive levels on concern defined by EPA. Risks are actually much lower because the residue calculations assumed a direct application and the pheromone is soluble in water, both of which are not representative of the use pattern or chemical characteristics of the pheromone.

Summary

As with any risk assessment, there is uncertainty due to the limited amount of available toxicity data. In aquatic systems, this uncertainty is addressed to a great extent based on the physical properties of the pheromone in aquatic systems which restricts exposure to water column and benthic organisms. In addition, any pheromone that may reach water volatilizes rapidly and degrades when exposed to oxidation and UV light.

Degradation of the pheromone in terrestrial environments is also rapid with half-lives ranging from a few hours to slightly greater than one day.

Uncertainty exists in the calculated residues in terrestrial environments where they do not account for all food types that can be consumed by various mammals and birds. The values represent levels for mammals and birds that have high consumption rates relative to their body size and would, therefore, potentially consume proportionally larger amounts of pheromone. The higher proportional consumption rates and the assumption that all consumed food items are contaminated with upper-bound estimates of residues provides a conservative estimate of risk.

Uncertainty regarding the toxicity of the active ingredient (which is what the standard toxicity studies are based on) versus the toxicity of the formulation is also reduced since greater than 95% of the inert material is deionized water. The remaining 4 to 5% of the inerts are materials that occur at very low concentrations and are not considered to be of toxicological significance due to low exposure and/or toxicity.

Risks are actually much lower than the calculated values above since the residue calculations assumed a direct application and the pheromone is soluble in water, both of which are not

representative of the use pattern or chemical characteristics of the pheromone. Based on the available toxicity and environmental fate data, and extremely conservative exposure assumptions, the risk to terrestrial and aquatic nontarget organisms is expected to be negligible from applications of acetate-based straight chain lepidopteran pheromones.

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